

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Cross-Ownership of Broadcast Stations and
Newspapers

Newspaper/Radio Cross-Ownership Waiver
Policy

MM Docket No. 01-235

MM Docket No. 96-197

COMMENTS OF MORRIS COMMUNICATIONS CORPORATION

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SUMMARY

The newspaper/broadcast cross-ownership ban, which prohibits common ownership of a broadcast station and a daily newspaper in the same market, should be eliminated. The Telecommunications Act of 1996, coupled with established principles of administrative law, place the burden squarely on the FCC to present specific evidence and reasoned analysis to justify maintenance of this outdated prohibition. As a result of the sweeping changes that have occurred in the media marketplace and the repeal or substantial relaxation of local ownership restrictions in virtually all other contexts, the Commission cannot meet this heavy burden.

Morris currently operates newspaper/broadcast combinations in Amarillo, Texas and Topeka, Kansas pursuant to temporary conditional waivers of the newspaper/broadcast cross-ownership ban. Morris' experience, and the superior service offered by its outlets in those markets, provide substantial evidence that the FCC's anachronistic cross-ownership ban is unnecessary to increase competition or diversity, and indeed denies the public the many benefits that can result from the common ownership of newspaper and broadcast stations. Both sets of cross-owned outlets have a long history of joint ownership, and, concomitantly, service in the public interest. Further integration of Morris' newspaper and broadcast operations could bring enhanced benefits to the public in the form of increased news coverage of important local and national events, additional in-depth reporting, as well as improved weather and emergency coverage. Moreover, combining sales and advertising staffs would permit Morris to offer advertisers the benefits of one-stop shopping.

Furthermore, the Topeka and Amarillo markets, along with markets of all sizes across the country, have experienced tremendous growth in the number and variety of outlets for news, information, and advertising. This virtual explosion of the media marketplace has been marked by the development of new technologies not imagined when the Commission adopted the rule,

now including the Internet and DBS, as well as the proliferation of outlets that were in their infancy in 1975, such as cable, weekly newspapers, direct mail and magazines. These profound changes in the media marketplace, which have significantly increased the number of outlets that provide news, information, and advertising, eviscerate the diversity and competition rationales upon which the newspaper/broadcast cross-ownership ban was based. The FCC has recently come to recognize this in other contexts, and has accordingly eliminated or substantially relaxed virtually all of its other local mass media ownership restrictions, leaving the newspaper/broadcast cross-ownership ban an isolated remnant of an outdated regulatory regime. The transformation in the media and regulatory landscape, combined with the absence of any empirical evidence that joint operation of newspapers and broadcast stations causes harm to diversity or competition – and, indeed, substantial evidence of superior service by commonly owned outlets – require the Commission to repeal its counterproductive and antiquated newspaper/broadcast cross-ownership restriction.

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I. INTRODUCTION

Morris Communications Corporation (“Morris”), hereby submits its comments in the above-captioned proceeding, which was initiated by the Federal Communications Commission (“FCC” or “Commission”) to consider elimination or modification of the newspaper/broadcast cross-ownership ban embodied in Section 73.3555(d)(1)-(2) of the Commission’s rules.¹ For the reasons set forth below, Morris strongly supports the comments being filed today by the Newspaper Association of America (“NAA”)² urging the Commission to repeal its antiquated and discriminatory prohibition on common ownership of daily newspapers and broadcast

¹ 47 C.F.R. § 73.3555(d)(1)-(2); Cross-Ownership of Broadcast Stations and Newspapers; Newspaper/Radio Cross-Ownership Waiver Policy, Notice of Proposed Rulemaking in MM Docket Nos. 01-235, 96-197, FCC 01-262 (rel. Sept. 26, 2001) (“NPRM”). The daily newspaper/broadcast cross-ownership rule prohibits common ownership of a broadcast station and a daily newspaper in the same market.

² See Comments of the Newspaper Association of America in MM Docket Nos. 01-235, 96-197 (filed December 3, 2001) (“NAA Comments”).

stations.³

The newspaper/broadcast cross-ownership ban was originally adopted in 1975 as part of a regulatory regime that has since been dismantled, in a media marketplace that bears little resemblance to that of the present. Even at that time, the Commission was unable to marshal concrete evidence that newspaper/broadcast combinations posed any threat to diversity or competition. In fact, the FCC acknowledged that its own competitive analysis had failed to show any effect on advertising rates attributable to newspaper ownership and, instead, justified the prohibition on a “mere hoped for gain in diversity.”⁴

In the Telecommunications Act of 1996 (the “1996 Act”), Congress specifically directed the Commission to review and eliminate unnecessary broadcast ownership rules.⁵ Section 202(h) of the 1996 Act requires the FCC to “review . . . all of its ownership rules biennially as part of its regulatory reform review under section 11 of the Communications Act of 1934” and to “determine whether any of such rules are necessary in the public interest as the result of competition.”⁶ The statute further obligates the Commission to “repeal or modify any regulation

³ In 1997, Morris filed reply comments in response to the Commission’s Notice of Inquiry that was issued to explore possible revisions of the FCC’s existing policies concerning waivers of the rule as it applied to newspaper/radio combinations, see Newspaper/Radio Cross Ownership Policy, 11 FCC Rcd 13003 (1996), in which it argued that the newspaper/broadcast cross-ownership rule should be repealed. Morris hereby incorporates those reply comments by reference. See Reply Comments of Morris Communications Corporation and Stauffer Communications, Inc. in MM Docket No. 96-197 (filed March 21, 1997).

⁴ Amendment of Sections 73.34, 73.240, and 73.636 of the Commission’s Rules Relating to Multiple Ownership of Standard, FM, and Television Broadcast Stations, 50 FCC 2d 1046, 1072, 1078 (1975) (“1975 Multiple Ownership Report”), recon., 53 FCC 2d 589 (1975), rev’d in part sub nom., National Citizens Comm. for Broadcasting v. FCC, 555 F.2d 938 (D.C. Cir. 1977) (“NCCB v. FCC”), reinstated, FCC v. National Citizens Comm. for Broadcasting, 436 U.S. 775 (1978) (“FCC v. NCCB”).

⁵ Pub. L. No. 104-104, 110 Stat. 56 (1996).

⁶ 1996 Act § 202(h). Section 11 of the Communications Act similarly requires the Commission

it determines to be no longer in the public interest.”⁷ In concrete terms, the FCC must “start with the proposition that the rules are no longer necessary” and must “justify [the] continued validity” of any rule it declines to repeal or relax.⁸ As an outgrowth of the 1998 and 2000 Biennial Reviews, the instant proceeding is governed by this standard.⁹

The obligations imposed by the 1996 Act are mirrored in well-settled principles of administrative law that require an agency to review and alter its rules based upon intervening changes in circumstances that cause a regulation to no longer serve its intended public interest goal.¹⁰ The Commission’s burden is heightened where, as here, the prohibition was never

to engage in a biennial regulatory review of all regulations, to “determine whether any such regulation is no longer necessary in the public interest as the result of meaningful economic competition” and to “repeal or modify any regulation it determines to be no longer necessary in the public interest.” 47 U.S.C. § 161.

⁷ 1996 Act § 202(h).

⁸ Biennial Regulatory Review – Review of the Commission’s Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, 15 FCC Rcd 11058, 11151 (2000) (“1998 Biennial Review Report”) (Separate Statement of Commissioner Michael K. Powell); see id. at 11132 (Dissenting Statement of Commissioner Harold Furchtgott-Roth).

⁹ See 2000 Biennial Regulatory Review, 16 FCC Rcd 1207, 1218 (2001) (“2000 Biennial Review Report”) (“In the near future, we will also issue a notice of proposed rulemaking seeking comment on whether we need to modify the daily newspaper/broadcast cross-ownership rule in order to address contemporary market conditions.”); 1998 Biennial Review Report, 15 FCC Rcd at 11105 (“[W]e believe that there may be circumstances in which the [newspaper/broadcast cross-ownership] rule may not be necessary to achieve its intended public interest benefits. We, therefore, will initiate a rulemaking proceeding to consider tailoring the rule accordingly.”).

¹⁰ See, e.g., American Trucking Ass’n, Inc. v. Atchinson, 387 U.S. 397, 416 (1967) (stating that “[r]egulatory agencies do not establish rules of conduct to last forever; they are supposed, within the limits of the law and of fair and prudent administration, to adapt their rules and practices to the Nation’s needs in a volatile, changing economy.”); Home Box Office v. FCC, 567 F.2d 9, 9 (1977) (stating that “a regulation perfectly reasonable and appropriate in the face of a given problem may be highly capricious if the problem does not exist.”); see also Geller v. FCC, 610 F.2d 973, 980 (D.C. Cir. 1979) (“[A] statute depending for its validity upon a premise extant at the time of enactment may become invalid if subsequently that predicate disappears. It can hardly be supposed that the vitality of conditions forging the link between Commission regulations and the public interest is any less essential to their continuing operation.”).

grounded in concrete evidence but, instead, was based upon a speculative “best guess” that it would lead to increased diversity.¹¹ In addition, the courts have consistently held that when the First Amendment is involved, proponents of regulation must provide specific evidence to support any potential infringement on free speech rights.¹² Accordingly, the 1996 Act’s directive, combined with established principles of administrative and constitutional law, place the burden squarely on the FCC to demonstrate that any ownership restriction the Commission retains is appropriate and necessary to address a clear problem in today’s media marketplace.

With respect to the newspaper/broadcast cross-ownership prohibition, Morris believes that the record establishes that the ban does not further any demonstrable public interest objective. Today’s media marketplace has a greater level of diversity and competition than the Commission could have imagined in 1975. The dramatic rise in diversity and competition is not a product of governmental regulation, but is instead a result of the technological revolution and the explosive growth in competition among an ever-expanding array of media and advertising outlets that has occurred during the last quarter century. Moreover, the experiences of Morris and others who operate the approximately forty newspaper/broadcast combinations in existence today demonstrate that newspaper/broadcast combinations in fact enhance the quantity and quality of news and informational programming in the contemporary marketplace, rather than detracting from it. Under these circumstances, the Commission is obligated to repeal its

¹¹ See Bechtel v. FCC, 10 F.3d 875, 880 (D.C. Cir. 1993) (criticizing the FCC for its continued dependence on unverified predictions” in defense of its decades-old “integration” policy); ACLU v. FCC, 823 F.2d 1554, 1565 (D.C. Cir. 1987) (stating that “where the Commission itself has recognized the tentative nature of its predictive judgments . . . , we find it particularly appropriate to emphasize the need to vigilantly monitor the consequences of its [cable] rate regulation rules.”).

¹² See Time Warner Entertainment Co. v. FCC, 240 F.2d 1126, 1126 (D.C. Cir. 2001) (“Time Warner II”); Turner Broadcasting Sys., Inc. v. FCC, 512 U.S. 622, 664 (1994) (“Turner I”) (quoting Quincy Cable TV Inc. v. FCC, 768 F.2d 1434, 1455 (D.C. Cir. 1985)).

anachronistic newspaper/broadcast cross-ownership ban.

II. MORRIS COMMUNICATIONS CORPORATION

Morris is one of the country's strongest mid-sized privately held media companies, with diversified holdings that include newspaper publishing and radio broadcasting. Newspapers are the foundation and core business of the company, which dates back to the 1800s. Morris has fulfilled its longstanding commitment to providing the public with truthful, fair and accurate information through its diversified group of media holdings, which today includes 27 daily newspapers, 27 radio stations and three radio networks, as well as nine nondaily newspapers, an outdoor advertising company, two book publishing and distribution companies (one in London), 15 tourist publications (two in London), 20 magazines and specialized publications, 15 free community papers, a direct marketing company, two commercial printing operations, an online services division and computer services operations.¹³

Morris acquired a controlling interest in its first newspaper, the Augusta Chronicle, in 1945, and entered the broadcasting business in 1956 with the acquisition of Augusta, Georgia's first licensed radio station, WRDW, and its companion television station. That venture was short-lived, and the stations were sold in 1960. In 1995, broadcasting again became part of the company, with the acquisition of Stauffer Communications, Inc. ("Stauffer").¹⁴

¹³ A number of Morris' media properties serve specialized audiences. For example, Morris' book publishing business focuses on travel and outdoor recreation, complementing its tourist publications. Morris' magazine publishing business includes publications serving particular communities and industries, including the quarter horse industry and the barrel horse industry. Morris' online services division provides ISP services, serves as the world wide web publisher for Morris' newspapers and specialty publications, and operates a travel site, <www.Excursia.com>, as well as <www.HorseCity.com> (serving the horse industry), <www.Big12.net> (a discussion board about "Big 12" college sports), and <www.FanaticZone.com> (providing coverage of Southeastern Conference sports).

¹⁴ See Stauffer Communications, Inc., 10 FCC Rcd 5165 (1995).

Morris currently operates two radio/newspaper combinations pursuant to temporary conditional waivers granted in connection with the Commission's approval of its acquisition of Stauffer.¹⁵ Morris is the parent company of MCC Radio, LLC, the licensee of WIBW(AM) and WIBW-FM in Topeka, Kansas, where Morris owns and operates the Topeka Capital-Journal. MCC Radio, LLC is also the licensee of KGNC(AM) and KGNC-FM in Amarillo, Texas, where Morris owns and operates the Amarillo Globe-News. Since the acquisition of the radio stations by Morris, the broadcast outlets and newspapers in each market have maintain separate staffing and, therefore, have been unable to take full advantage of the numerous synergies and efficiencies that might be generated through common ownership and operation of the facilities. Nevertheless, Morris' ownership of newspaper and broadcast properties in these two markets provides compelling evidence that supports repeal of the newspaper/broadcast cross-ownership ban.

III. MORRIS' EXPERIENCE WITH COMMON OWNERSHIP OF BROADCAST AND NEWSPAPER PROPERTIES CONFIRMS THAT CO-OWNED BROADCAST AND NEWSPAPER OUTLETS PROVIDE SUPERIOR SERVICE

As the Commission recognized when it adopted the newspaper/broadcast cross-ownership rule in 1975, joint newspaper/broadcast operations typically provide superior public service to their local audiences.¹⁶ Morris' operation of its newspaper and radio properties in Topeka and Amarillo has proven the accuracy of this observation. Morris believes that if it were

¹⁵ See Stauffer Amarillo Radio Trust, 11 FCC Rcd 14865 (1996). A complete discussion of the facts surrounding Morris' acquisition of Stauffer can be found in Morris' reply comments in the Commission's 1996 Newspaper/Radio Cross-Ownership Waiver Policy proceeding, which are incorporated by reference. See supra, note 3. Morris' waiver has since been extended, pending the outcome of this proceeding. See NPRM at ¶ 16.

¹⁶ See 1975 Multiple Ownership Report, 50 FCC 2d at 1078, 1094-98 (App. C.) (concluding that there was a "statistically significant superiority in newspaper owned television stations in a number of program particulars.").

permitted to make full use of the synergies and efficiencies of cross-ownership, even greater benefits could be realized through its Topeka and Amarillo properties. Further, Morris would be free to pursue the possibilities of additional combinations in other markets where it now owns newspapers or broadcast stations but is currently precluded from acquiring complementary properties.

A. Morris' Topeka and Amarillo Properties Have a Long History of Providing Superior Service Within Their Communities.

WIBW(AM) and WIBW-FM have been owned by the publishers of the Topeka Capital Journal since 1957.¹⁷ The Topeka radio stations have a long history of providing their local community with superior entertainment as well as local news and information, as evidenced by their popularity among listeners and their ratings success.¹⁸ WIBW(AM) broadcasts its own locally produced programming, from 5:00 a.m. until 12:30 p.m. and from 5:30 p.m. until 9:00 p.m. daily.¹⁹ Between 6:00 a.m. and 9:00 a.m., the station airs an all-news format, and broadcasts top- and bottom-of-the-hour newscasts during all other times. Similarly, WIBW-FM has its own news staff and develops and presents its own newscasts as an integral part of its daily

¹⁷ Between 1927 and 1957, the owner of another publication, Capper's Weekly, controlled the stations. Additionally, prior to the transfer of control to Morris in 1995, Stauffer also was the licensee of WIBW-TV, which has since been sold to Benedek Broadcasting Corporation. See FCC File Nos. BALCT-19960111IQ, et al.

¹⁸ See BIA Financial Network, Radio Market Report 2001, Topeka, KS Competitive Overview (2001).

¹⁹ Morris' WIBW(AM) is one of the last "shared time" stations in the United States, and shares time with KKSU, an educational station operated by the Kansas State University. Under the shared time arrangement between the stations, WIBW(AM) signs off each weekday at 12:30 p.m., and KKSU signs on and broadcasts on the same frequency for 5 hours. WIBW(AM) then signs back on at 5:30 p.m. Obviously, this longstanding time-sharing arrangement substantially restricts WIBW(AM)'s ability to provide continuous coverage of important events. Nevertheless, as discussed above, the station offers its listeners a substantial amount of independently produced local programming.

programs – unlike the “rip and read” approach common among FM stations. Because agriculture is among the most important industries in Kansas, the two radio stations share a three-person farm reporting staff, and WIBW(AM) broadcasts a host of farm information in addition to its news, talk, and sports programming. WIBW-FM supplements its regular newscasts with information about important agricultural developments in the area. WIBW(AM) has been the “flagship” station of Kansas State University for over 20 years, and airs all of the university’s sporting events. WIBW(AM) also regularly broadcasts over 200 local high school sporting events. WIBW(AM) and –FM staff also are heavily involved in community affairs. As an example, Craig Colboch, the stations’ general manager, is the immediate past president of the Better Business Bureau of Northeast Kansas.

The Topeka Capital-Journal also has a long history of superior service, and has recently expanded its commitment to provide superior online access to the contents of the newspaper and other enhanced services through its website, <www.cjournal.com>. Rob Curley, the director of new media for the Topeka Capital-Journal, has received the “New Media Pioneer Award” from the NAA for his work on the newspaper’s Internet version.²⁰ The Topeka Capital-Journal’s homefinder service also received awards from the NAA, being named “Best Classified Use of New Media” in the less than 75,000 circulation category.²¹ Through cooperation with the Morris News Service, which maintains a Washington News Bureau as well as similar bureaus in Atlanta, Georgia and Austin, Texas, the Topeka Capital-Journal is able to provide its readers with wide-ranging coverage of national and regional news.

²⁰ See Morris Earns Five Top Awards in Digital Publishing: Topeka’s Rob Curley Named NAA’s ‘New Media Pioneer,’ ‘Best News Site’ Honors Go to Savannah at <www.morris.com/standard/press/July20.2001.html> (July 20, 2001).

²¹ See id.; <www.cjonline.com/homefinder>.

KGNC(AM) and KGNC-FM in Amarillo similarly have a long history of common ownership by the publishers of a local newspaper and, concomitantly, a long history of service in the public interest. The publisher of the Amarillo daily newspaper, the Globe-Times Publishing Co., put KGNC(AM)'s predecessor station on the air in 1922, and in 1947 started operating KGNC-FM. During the station's first period of newspaper ownership, KGNC(AM) was built into a highly respected regional information station, broadcasting local news, farm and ranch reports, and talk programming, often featuring well-known writers and editors from the newspaper. KGNC-FM, similarly, has always been a leader among FM stations in the Amarillo market. The accomplishments of the Amarillo Globe-Times, the Globe-News' predecessor, are exemplified by the paper's receipt of the coveted Pulitzer gold medal for community service in 1961 as a result of investigations into corruption in county affairs. The newspaper/radio alliance made possible considerably more of this type of public interest programming and reporting than would ever have been possible for independent owners in smaller markets at the time. Common ownership of the radio stations and the Amarillo daily paper continued until 1966, when Stauffer purchased KGNC(AM) and KGNC-FM. Morris acquired the Amarillo daily newspaper in 1972, and the radio stations in 1995.

Under Morris' control, KGNC(AM) and KGNC-FM have continued to offer the citizens of Amarillo superior service, as evidenced by their high ratings among listeners.²² KGNC(AM) produces a substantial amount of local news and talk programming and maintains a top-ranked agri-business department. KGNC(AM) regularly airs locally produced, information-oriented programming from 5:30 until 11:00 a.m. and 2:00 p.m. until 7:00 p.m. each day.²³ On the

²² See BIA Financial Network, Radio Market Report 2001, Amarillo, TX Competitive Overview (2001).

²³ KGNC(AM)'s position as a leader in providing Amarillo with breaking news was exemplified

weekends, KGNC(AM) airs an additional five hours of local programming. KGNC(AM) also broadcasts a substantial amount of local sports programming. The station is the “flagship” station of West Texas A&M University, the only four-year college in the Amarillo metropolitan area, and airs more than 90 of the university’s sporting events each year. KGNC(AM) also regularly broadcasts a large number of local high school sporting events. Like WIBW(AM), its counterpart in Kansas, KGNC(AM) provides hourly local newscasts.

KGNC-FM, in turn, is the only music station out of sixteen licensed to Amarillo that presents regular local news programming, produced by KGNC-FM in conjunction with the KGNC(AM) news staff. Additionally, KGNC-FM is one of only three stations in the Amarillo market that airs live local programming during the morning drive time, providing listeners with local news and traffic information while they are commuting to work. KGNC-FM also is heavily involved in community affairs in Amarillo. The station’s promotion director participates in more than 10 events monthly, sponsored by local public service and charitable organizations. Representatives of organizations that sponsor such events appear frequently as guests on KGNC-FM’s morning show. In addition, KGNC(AM)’s commitment to the farm community was recently recognized by Epsilon Sigma Phi, the Texas state extensive service professionals’ honor society, which awarded the station’s farm director, Bob Givens, its “State Friend of Extension” award in 2000.²⁴ The station’s general manager, Dan Gorman, was similarly honored for his commitments to the Amarillo community by the Amarillo Chamber of Commerce, which named

in the wake of the tragic events of September 11, when KGNC(AM)’s news coverage was provided via simulcast on KGNC-FM, as well as KPAN(AM)/-FM (licensed to KPAN Broadcasters), KQTY(licensed to Zia Broadcasting Company) and KGRO (licensed to Pampa Broadcasters, Inc.).

²⁴ See Awards and Honors at <www.morris.com/standard/press/other-awards.html> (First Quarter 2000).

him “Volunteer of the Year.”

The Amarillo Globe-News similarly provides Amarillo residents with outstanding local and national news coverage, and is heavily committed to serving its local community. Through its website, <www.amarillonet.com>, the newspaper offers readers a web portal containing all of the content in the paper as well as discussion forums on TalkAmarillo and interactive community and entertainment calendars. In addition, the Amarillo Globe-News sports editors have received awards from the Associated Press for general excellence in sports reporting and for their special section on area high school football, entitled “Friday Night Flashbacks/Pigskin Preview.”²⁵ The newspaper’s participation in local charity events is further testament to its commitment to the Amarillo community. In January 2001, for example, the Amarillo Globe-News kicked off an eighteen-month “Reach out Volunteer” program, which includes a daily front-page salute to a local volunteer and provides matching of donations made to local charities by its sponsors. The newspaper also sponsors an annual 10-K/5-K race benefiting local public service organizations and participates in the “Newspapers in Education” program, which provides free newspapers to local elementary schools. In addition to its fundraising efforts, the Globe-News has sponsored Amarillo’s annual Fourth of July fireworks celebration for several decades. In recent years, KGNC(AM)/-FM have simulcast a choreographed musical production during the celebration, thereby enhancing the fireworks display.

Of course, there has never been any evidence that the Topeka or Amarillo stations were programmed or sold advertising in a manner inconsistent with the public interest. On the contrary, the Commission time and time again has regularly renewed the station’s licenses, and the FCC has never found any cause for concern with respect to diversity or competition in the

²⁵ See Sports Editors Honor Best in the Nation at <http://www.morris.com/standard/press/sports_1stquarter.html> (First Quarter 2000).

Topeka marketplace. As demonstrated above, newspaper ownership has unquestionably fostered the development of the Topeka and Amarillo stations as vital outlets for local news, agricultural reports, and similar public service programming.

B. The Record in This Proceeding Supports Elimination of the Newspaper/Broadcast Cross-Ownership Rule in its Entirety, Without Imposition of Structural Separation Requirements.

As the FCC has acknowledged, common ownership is likely to enable newspapers and broadcast stations to realize considerable cost savings by (1) sharing staff members in various business units, including newsgathering, news reporting, advertising sales, technical services, administrative and business functions, and human resources; (2) sharing physical facilities and thus reducing rent and overhead costs; and (3) sharing newsgathering resources such as news bureaus and wire services. As stated in the NPRM, “[s]ome of the additional savings [generated by cross-ownership] could . . . be passed along to listeners, viewers, and subscribers in the form of enhanced content.”²⁶

Since its acquisition of newspaper/radio combinations in Topeka and Amarillo, Morris has continued to operate the print and broadcast facilities separately. Nevertheless, the foregoing discussion provides concrete evidence of the superior service provided by Morris’ newspaper/broadcast combinations. The quality and quantity of local news and information would only be increased if the FCC were to repeal the cross-ownership rule and permit further integration of broadcast and newspaper operations.

As discussed above, Morris’ Topeka radio stations currently provide agricultural information by way of a three-person farm reporting staff. Utilization of the efforts of the combined farm reporting staffs of WIBW(AM) and the Topeka Capital-Journal, however, would

²⁶ NPRM at ¶ 25.

permit WIBW(AM)/-FM to provide significantly improved coverage of news and local events affecting the many area citizens who depend upon agriculture for their livelihood. Weather and disaster coverage is another area that could be vastly improved by allowing sharing of resources. Severe weather, including tornadoes, ice storms, and blizzards, is exceedingly common in Eastern Kansas, and no radio station can employ enough reporters to be on hand for every such occurrence. With the far reaching network of “stringers” employed by the Topeka Capital-Journal available to deliver instant eyewitness reports, live radio coverage of severe weather conditions affecting the listening areas of WIBW(AM) and WIBW-FM could be greatly improved, bringing significant benefits to the public in the event of a weather emergency. Similarly, the availability of the co-owned newspaper’s reporting staff would enable the radio stations to provide on-the-spot coverage of natural disasters and other life-threatening situations in which the availability of accurate and up-to-the-minute information is vitally important to the safety of the residents of the affected areas.

Day-to-day news coverage of local, state, and even national events could also be significantly increased through use of the combined resources of the Topeka radio stations and the co-owned daily newspaper. As noted above, the Topeka Capital-Journal has access to the Morris News Service, which could be relied upon by the radio station to supplement news and public affairs coverage from national networks. The newspaper’s reporting staff also could share information and resources with the radio stations that would allow greater depth of coverage and coverage of an increased number of events with a focus on the Topeka area in particular—a focus that national sources cannot be expected to provide. Utilization of the newspaper’s reporters could also enable the radio stations to undertake assignments that are now out of reach due to budgetary or personnel limitations, such as investigative reporting efforts and other

special efforts. Moreover, with the ability to combine efforts with the local newspaper for coverage of events such as state high school sports tournaments, the Topeka radio stations could improve both the quantity and quality of sports coverage, to the benefit of radio listeners and newspaper subscribers, as well as the high school sports programs in the community. The radio stations could also provide useful music and computer industry news for inclusion in the newspaper.

Similar public service benefits could be realized if KGNC(AM)/-FM and the Amarillo Globe-News were permitted to continue to operate under common ownership free of any requirement that they maintain separate staffs. Over the more than forty-year period during which the Amarillo stations were under joint ownership with the daily newspaper, KGNC(AM) established itself as a leader in the provision of local news, agricultural information and talk programming.

If common ownership and greater integration of the newspaper and radio station operations of the Amarillo Globe-News and KGNC(AM)/-FM were permitted on a permanent basis today, the newspaper would be able to provide more aggressive farm and ranch coverage by calling on KGNC(AM)'s agri-business department. Similarly, the radio stations could take advantage of the "stringer" network maintained by the newspaper across the five-state area surrounding Amarillo, permitting improved dissemination of breaking news stories and emergency weather reports. As with the Topeka stations, KGNC(AM) and KGNC-FM could take advantage of the resources of the Morris News Service, allowing greater coverage of national events, and the entities' combined sports staffs would be able to report on more local sporting events than either could possibly cover on an independent basis. Likewise, combining the operations of the newspapers and broadcast stations would make possible more investigative

reporting and similar undertakings, would improve local news, talk, and agricultural programming, and would ensure that KGNC-FM can continue to provide local news coverage.

Moreover, as the FCC stated in the NPRM:

[T]he efficiencies of a merger [between a broadcast station and a daily newspaper in the same market] may enable [the] broadcast station and [the] newspaper to combine sales and operations staff, and thereby save expenses or reduce advertising prices. At least some of the savings could be passed on to advertisers.²⁷

Because Morris has thus far refrained from combining its newspaper and radio operations, it has not been able to pass along any cost savings to advertisers or to offer the benefits of “one-stop shopping” to companies that might choose to advertise on both its radio stations and its newspapers within a single market. If the Commission were to lift the newspaper/broadcast cross-ownership ban and allow integration between newspaper and broadcast advertising sales operations, Morris would not only be able to provide the enhanced programming and public service discussed above, but could also provide its advertising customers with enhanced service, such as package rates, custom tailored mixed-media campaigns, and one-stop shopping.

Morris does not expect that integration of newspaper and broadcast properties would in any way result in a homogenization of content. Rather, the newspaper and radio properties in Topeka and Amarillo, respectively, have been historically operated independently insofar as viewpoint is concerned; the editorial stances of the radio stations in the two markets have never been dictated by those in control of the co-owned newspaper.²⁸ Furthermore, as the Commission has previously acknowledged, common ownership may create commercial incentives to diversify

²⁷ NPRM at ¶ 25.

²⁸ In fact, WIBW(AM) and WIBW-FM have frequently broadcast radio editorials that directly conflict with the Topeka Capital-Journal’s editorial stance in the past, and would continue to do so absent the structural separation requirements.

programming among outlets in order to produce the largest aggregate audience for the overall enterprise.²⁹ Consequently, editorial content will not automatically merge in the future if Morris is permitted to continue to own both newspaper and radio outlets in Topeka and Amarillo or to acquire combinations elsewhere. Although the reporting resources of the various properties could be combined on specific projects to provide benefits to the public, Morris does not anticipate that the editorial voices of the co-owned facilities would be the same.³⁰ Moreover, as demonstrated in the following section, the level of diversity that is present in Amarillo and Topeka, as well as markets of every size across the nation, virtually eliminates the possibility that a single owner could monopolize the information or advertising marketplace in any locale.

IV. AN ANALYSIS OF THE HIGHLY COMPETITIVE MARKETS IN AMARILLO AND TOPEKA DEMONSTRATES THAT REPEAL OF THE NEWSPAPER/BROADCAST CROSS-OWNERSHIP RULE WILL HAVE NO ADVERSE IMPACT ON DIVERSITY OR COMPETITION

A. The Commission Itself Has Previously Recognized That the Topeka and Amarillo Markets Are Served by a Multiplicity of Media Sources

In its decision approving Morris' acquisition of the newspaper/radio combinations in Topeka and Amarillo, the Commission examined the relevant markets and expressly found that

²⁹ See, e.g., Review of the Commission's Regulations Governing Television Broadcasting: Television Satellite Stations Review of Policy and Rules, 10 FCC Rcd 3524, 3551 n.81 (1995) ("stations managed in common may have greater incentives to appeal separately to distinct segments of the audience with distinct programming."); Revision of Radio Rules and Policies, 6 FCC Rcd 3275, 3276 (1991) ("where one party owned all the stations in a market, its strategy would likely be to put on a sufficiently varied programming menu in each time slot to appeal to all substantial interests.").

³⁰ Indeed, when the FCC adopted the newspaper/broadcast cross-ownership ban in 1975, it acknowledged that co-owned "print and [broadcast] outlets were [not] mirror images of one another, speaking with one voice" as a factor in saving numerous combinations from divestiture. 1975 Multiple Ownership Report, 50 FCC 2d at 1089.

the combinations would not “appreciably affect diversity or competition.”³¹ The FCC pointed to showings by Stauffer and Morris which indicated that the Topeka-Lawrence-Osage radio market was served by 15 radio stations, while the Topeka Designated Market Area (“DMA”) included four television stations licensed to Topeka as well as four low power television stations.³² Similarly, Morris demonstrated that the Amarillo-Canyon radio market is served by 26 radio stations, and that the Amarillo DMA was served by at least six television stations (five of which are licensed to Amarillo), at least six low power television stations, and at least one television translator station.³³ This decision was consistent with the Commission’s earlier decision granting a temporary waiver of the newspaper/broadcast cross-ownership rule to permit Morris to initially acquire control of the Stauffer properties in Topeka, in which the agency had expressly found that “the market of Topeka hosts a multiplicity of alternative media services.”³⁴

B. A More Thorough Examination of the Topeka and Amarillo Markets Reveals That an Even Larger Number of Media Outlets Compete Today with Morris in the Information and Advertising Marketplace.

The Commission’s previous analysis of the Topeka and Amarillo markets took into account only FCC-authorized facilities in the defined areas and, Morris submits, incorrectly defined the relevant advertising product market. The agency assumed that newspapers and broadcast stations make up a definable product market, and considered only competitors within that “market” in its competitive analysis. As a preliminary matter, the FCC’s analysis incorrectly lumps newspaper and broadcast stations together in a monolithic product market, without due

³¹ Stauffer Amarillo Radio Trust, 11 FCC Rcd at 14868.

³² Id. at 14867.

³³ Id.

³⁴ Stauffer Communications, Inc., 10 FCC Rcd at 5165.

regard for the differences between the various media. Moreover, the Commission's analysis fails to take into account numerous alternative advertising and information outlets that compete with newspapers and broadcast stations to the same degree that those media compete with each other. Thus, the FCC's analysis is at the same time over-inclusive and under-inclusive, and significantly underestimates the level of competition that exists in these markets.

As the Commission acknowledges in the NPRM, any competitive analysis must begin with the definition of the relevant product market.³⁵ In this case, the FCC has stated that the definition of the relevant product market turns on whether newspapers and radio stations are interchangeable substitutes for advertisers and the public.³⁶ Morris submits that, although newspapers and radio stations both provide advertising, news and information, they cannot be regarded as fully interchangeable. The degree to which advertisers view newspapers and radio stations as substitutes varies extensively depending on the identity of the advertiser, the product, and the intended target audience. Indeed, the Commission itself has acknowledged that there is no concrete evidence that newspapers and radio stations are part of a self-contained advertising or information market. During the 1998 Biennial Review, the Commission based its decision to retain the local radio ownership rules at least in part upon the lack of direct substitutes for radio advertising.³⁷ Accordingly, the degree to which newspapers and radio stations can be viewed as "competitors" in a single advertising product market cannot be generalized, and is insufficient to

³⁵ See NPRM at ¶ 21.

³⁶ See *id.*; United States v. E.I. du Pont de Nemours & Co., 351 U.S. 377, 394 (1956) (stating that products constitute a single competitive market when they are "reasonably interchangeable by consumers for the same purposes.").

³⁷ See 1998 Biennial Review Report, 15 FCC Rcd at 11088-89 (Acknowledging that "for certain advertisers, newspapers, cable, and broadcast television stations do not constitute an effective substitute for radio stations.").

warrant maintenance of an absolute ban on newspaper/broadcast cross-ownership.³⁸

Similarly, the degree to which the public views newspapers and broadcast stations as competitors in the information marketplace differs widely depending on the type of information that is being communicated and on each individual's particular preferences. Although newspapers and radio stations both provide news and information, they do so in entirely different formats. Indisputably, newspapers offer far greater in-depth coverage and background information on a wide variety of issues than do broadcast outlets. Additionally, inherent differences between newspapers and radio stations dictate differences in the type of news coverage offered. Newspapers, as a text-based medium, have far greater flexibility in terms of providing more detailed material that readers may need time to absorb and consider. Radio broadcasts, in contrast, are fleeting, and therefore must present information to viewers in an easily understandable fashion to convey a message quickly and effectively. Moreover, the Commission has "distinguished the influence of television from that of . . . both newspapers and radio as having more visual impact and serving more people as a primary source of news."³⁹ As newspapers and broadcast stations provide news in different formats for different purposes, they cannot be said to compete in a discrete definable market for news or information.

³⁸ As explained more fully in the NAA's comments, current economic and antitrust analysis support a finding that newspaper advertising and broadcast advertising are not sufficiently interchangeable to constitute a single product market, to the exclusion of other advertising vehicles. See NAA Comments. Accordingly, the prohibition on newspaper ownership of broadcast stations is unnecessary to protect against the danger that a newspaper/broadcast combination might pose an appreciable risk to competition in a single definable advertising market.

³⁹ 1998 Biennial Review Report, 15 FCC Rcd at 11117; see Review of the Commission's Regulations Governing Television Broadcasting, Television Satellite Stations Review of Policy and Rules, 14 FCC Rcd 12903, 12917-18 (1999) ("Local Television Ownership Order"), recon., 14 FCC Rcd 20571 (1999), further recon. 16 FCC Rcd 1067 (2001).

In sum, newspapers and radio stations are not wholly interchangeable, and thus should not be analyzed together as a single undifferentiated product market for all purposes. The Commission may not justify maintenance of the newspaper/broadcast cross-ownership rule based on an elusive desire to protect competition in an ill-defined market, as newspaper/broadcast combinations plainly cannot pose a competitive risk within segments in which newspapers and broadcast stations do not compete. If, however, the Commission were to choose to disregard marketplace realities and analyze newspapers and radio stations as part of the same “product market,” it would also have to consider all other forms of media that advertisers view as equally close substitutes, and could not arbitrarily include some media and exclude others. Any advertising market broad enough to encompass both newspapers and broadcast stations must also include a variety of alternative media, such as cable, weekly newspapers, yellow pages, magazines, direct mail, outdoor advertising, and the Internet—as well as any other media outlet that an advertiser could reasonably be expected to use to reach its target audience.⁴⁰ Alternative forms of information must be considered to the same degree in analyzing the effects of newspaper/broadcast combinations on diversity.

⁴⁰ A more detailed discussion of the extent to which other media outlets compete with newspapers and broadcast stations is provided in the comments of the NAA. See NAA Comments; Economists Incorporated, Horizontal and Vertical Structural Issues and the Newspaper-Broadcast Cross-Ownership Rules (December 2001) (attached to NAA Comments); see also National Economic Research Associates, Regulating Television Station Acquisitions: An Economic Assessment of the Duopoly Rule, at 2 (May 17, 1995) (attached to Local Station Ownership Coalition Comments in MM Docket No. 91-221 (filed May 17, 1995)) (concluding that a market for local advertising that includes radio, broadcast and newspaper advertising also includes direct mail, magazines, yellow pages, and outdoor billboards); Economists Incorporated, An Economic Analysis of the Broadcast Television National Ownership, Local Ownership, and Radio Cross-Ownership Rules, at 23-24 (May 17, 1995) (attached to CBS, NBC, ABC and Westinghouse Joint Comments in MM Docket No. 91-221 (filed May 17, 1995)) (citing empirical evidence demonstrating “that other forms of advertising, such as yellow pages, outdoor and direct mail, are substitutes for video, radio and newspaper advertising,” and concluding that “there is no evidence to support a conclusion that [these] other forms of advertising . . . do not constrain the prices of video, radio and newspaper advertising.”).

Moreover, to provide an accurate view of the level of competition actually faced by a newspaper or broadcast station, the geographic scope of any such "market" must be large enough to include the entire area within which a newspaper or broadcast company competes for audience and advertising dollars. At a minimum, this market must be as large as the markets used by the industries for audience and circulation measurement. Additionally, where a station's service area or a newspaper's circulation actually extends beyond the industry-defined area to which it is attributed, competing outlets in that expanded region must be considered as well.

Materials prepared by WIBW(AM)/-FM management, attached hereto as Appendix A, show that at least eight radio stations and six television stations are licensed to communities within the Topeka "Metro" counties as identified by Arbitron (Shawnee, Osage, Jackson, Wabaunsee, and Jefferson), and that an additional seventeen radio stations have a sufficient listenership to be listed in the Fall 1996 Arbitron report for Topeka. In addition to the Morris properties, the Topeka Metro also is the home of ten other newspapers, five cable systems, and a host of direct mail, yellow pages, outdoor, and other advertising services. If the Topeka DMA is considered, an additional twenty-two radio stations and one additional television station enter the mix, along with twenty-three more newspapers (including four dailies), and numerous additional cable and alternative advertising vehicles.

The WIBW-FM primary service contour, moreover, takes in a substantial area that is not included in the Topeka Metro or DMA, but in which the station of course faces further competition (from ten more radio stations, an additional TV station, a host of competing newspapers and cable systems, and additional direct mail services, outdoor advertising companies, and yellow pages publishers). The WIBW(AM) daytime 0.5 mV/m contour covers a far larger area still, and brings that station into competition with literally hundreds of information

providers and advertising vehicles throughout the eastern half of Kansas as well as adjacent portions of Nebraska, Iowa, Missouri, and Oklahoma.

The Amarillo information and advertising markets, in which KGNC(AM), KGNC-FM, and the Amarillo Globe-News are participants, are even more diverse and competitive. The materials prepared by the management of the Amarillo radio stations, attached hereto as Appendix B, show that the Morris outlets compete with thirty-one other radio stations, five television stations, two cable systems, and dozens of print, video, and other alternative information providers within Arbitron's Amarillo Metro Area alone. The service area of the Amarillo FM extends well beyond the Metro and brings Morris' radio stations (and the co-located newspaper) into competition with a substantially larger number of media voices. The Arbitron "Total Survey Area," or TSA, which provides one definition of the broader geographic market in which KGNC(AM) and KGNC-FM compete,⁴¹ includes at least twenty-seven more radio stations, twenty-two additional cable systems and many more alternative sources of news, information and advertising availabilities. The AM service area extends farther still, and increases the number of competitors exponentially.⁴² The Amarillo media listings also include several "on-line" Internet services, periodicals, and other alternative media that provide still further competition for the Morris radio stations and the daily newspaper in various segments of their respective markets. A full range of comparable alternatives exist in Topeka and, indeed, in

⁴¹ The Amarillo Metro includes Potter and Randall Counties. The TSA includes an additional 26 counties in Texas, two in New Mexico, and one in Oklahoma. The Arbitron TSA corresponds generally, but not exactly, to Nielsen's Amarillo DMA, which is used for television ratings purposes.

⁴² While more powerful radio stations are able to serve larger areas, they inevitably face greater competition from a larger number of broadcast, print, and other providers. Accordingly, the Commission should avoid any attempt to "weight" the facilities involved in a market analysis. The key consideration in determining the level of diversity and competition in a market is the availability, not the current effectiveness, of alternative media outlets.

virtually every market nationwide.

In fact, Morris' Amarillo media outlets have experienced a steady decline in advertising market share, as a result of competition from other media sources and the recent downward trend in the economy. According to an independent analysis conducted by Miller, Kaplan, Arase & Co., Certified Public Accountants, the combined market share of KGNC(AM) and -FM has declined 13.4 percent since 1997. This loss in market share demonstrates that, far from existing as a "giant" in the Amarillo advertising market, Morris has been hard hit by competition from other media outlets and the recent downward trend in the United States' economy.⁴³

The foregoing analysis demonstrates that even in smaller markets, daily newspaper publishers and radio broadcasters such as Morris today face extensive competition from a wide variety of established and emerging information providers, the great majority of which are not limited to a single outlet, but are free to operate on a multichannel or multimedia basis.⁴⁴ The enormous growth that has taken place over the past two decades in the number and variety of competing advertising outlets and information providers in virtually every market has eviscerated any concern that allowing newspaper/broadcast cross-ownership will cause any appreciable harm to competition or diversity. As the Topeka and Amarillo examples clearly

⁴³ As discussed more fully in the NAA's comments, current economic conditions have exacerbated the increasingly bleak financial situation faced by newspaper publishers and broadcasting companies in today's vigorously competitive marketplace. As NAA demonstrates, relief from the outmoded newspaper/broadcast cross-ownership rule would provide a critical boost to the newspaper and broadcast industries. See NAA Comments.

⁴⁴ For example, radio station owners who do not also have newspaper interests may own as many as eight stations in a market under the Telecommunications Act of 1996 and the Commission's current rules. A number of Morris' radio competitors already own such "expanded complements" of stations. While cable operators may not own local television stations, they are otherwise free to create "clusters" of systems and are able to offer multiple channels of programming and tap multiple revenue streams. Other non-broadcast competitors generally are free of any cross-ownership limitations.

demonstrate, whatever merit the ban on co-ownership might have had when it was adopted in 1975, it cannot be seriously questioned that the FCC's original justification for the restriction has been eliminated. Accordingly, Morris urges the Commission to repeal the outmoded newspaper/broadcast cross-ownership rule.

V. **THE NEWSPAPER/BROADCAST CROSS-OWNERSHIP RULE UNREASONABLY DISCRIMINATES AGAINST NEWSPAPER PUBLISHERS AND BROADCASTERS AND SHOULD BE ELIMINATED**

By singling out newspaper publishers and broadcast station owners, the FCC irrationally prevents the public from enjoying the enhanced news and information services that Morris and similar media companies could offer in the rule's absence. The newspaper/broadcast cross-ownership prohibition was adopted in 1975 as part of a series of restrictions on local ownership of media outlets, all of which were aimed at preventing ownership of more than one media outlet in a given market.⁴⁵ Thus, when it considered the constitutionality of the newspaper/broadcast cross-ownership restriction over twenty years ago, the Supreme Court found it significant that "the regulations treat newspaper owners in essentially the same fashion as other owners of the major media of mass communications were already treated under the Commission's multiple ownership rules."⁴⁶

In today's regulatory environment, in contrast, with the conspicuous exception of the newspaper/broadcast cross-ownership rule, virtually every major limitation on local broadcast media ownership has been substantially relaxed or eliminated based upon the Commission's recognition of the benefits of common ownership.⁴⁷ The newspaper/broadcast cross-ownership

⁴⁵ See generally 1975 Multiple Ownership Report, 50 FCC 2d 1046.

⁴⁶ FCC v. NCCB, 436 U.S. at 801.

⁴⁷ For example, the Commission recently relaxed the "one-to-a-market" rule and the "duopoly"

rule thus stands out as an anachronism not only in a competitive environment, but also a regulatory environment, that is markedly different from that in which it was adopted. Rather than being treated in the same fashion as other media owners today, newspaper publishers and broadcast station owners are now virtually unique among entities that may not realize the substantial efficiencies and public interest benefits inherent in cross-ownership.⁴⁸ While it has significantly relaxed or eliminated its other outdated cross-ownership restrictions, the FCC has, without justification, remained inflexible to date regarding newspaper/broadcast combinations. Where multiple common ownership is permitted among virtually all other media, it is patently arbitrary and discriminatory to continue to prohibit newspaper publishers from acquiring interests in even a single radio or television station in the same local market.⁴⁹

rule to permit a single entity to own a greater number of broadcast stations than was permitted under the FCC's prior rules. Significantly, common ownership of two television stations and a single radio station is now permitted in any market, regardless of the number of voices present. See Local Television Ownership Order, 14 FCC Rcd at 12947. Similarly, a single entity may now own two local television stations—which the FCC itself has identified as the most directly significant media voices in the local marketplace—in larger markets, and in many cases may also acquire multiple radio outlets. See id. at 12907-08, 12932-34. Local radio ownership limitations have also been significantly relaxed pursuant to the 1996 Act and in subsequent Commission proceedings. See 1996 Act § 202(b). Moreover, most other competitors in today's media marketplace, including cable operators and programmers, DBS providers, Internet service providers, and magazine publishers, generally operate free from restrictions on their ability to acquire newspapers or broadcast outlets.

⁴⁸ See 1998 Biennial Review Report, 15 FCC Rcd at 11157 (Separate Statement of Commissioner Michael K. Powell) (discussing the anomaly between the television duopoly rule and the newspaper/broadcast rule and stating that "I do not see why newspaper/broadcast combinations could not be regulated in the same way.").


⁴⁹ Should the Commission determine, notwithstanding the overwhelming evidence to the contrary, that some type of restriction on newspaper/broadcast cross-ownership remains necessary, it should adopt a broad and flexible waiver policy which takes into account the abundant diversity and strong competition present among information providers and advertising outlets in markets of every size, and which allows newspaper publishers and broadcast station licensees to bring the acknowledged benefits of common ownership to their readers and viewers. Moreover, any such policy should look favorably upon preserving grandfathered newspaper/broadcast combinations and any other combinations with a history of common

CONCLUSION

Whatever the validity of the Commission's justification at the time it adopted the restriction on newspaper/broadcast cross-ownership, it is clear that the rule is no longer necessary in the public interest. The dramatic changes that have occurred in the last quarter-century, detailed above and in previous submissions by Morris and numerous other parties in this and related proceedings, have rendered it impossible for the FCC to justify maintenance of this antiquated rule. Accordingly, the Commission should promptly eliminate the newspaper/broadcast cross-ownership rule and free newspaper publishers and broadcasters to deliver to the public the enhanced service that can be generated by the synergies and efficiencies that result from common ownership.

Respectfully submitted,

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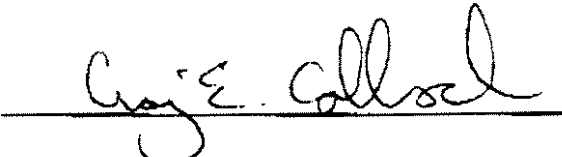
December 3, 2001

ownership and operation in the public interest, and should permit all applicants to demonstrate, on a case-by-case basis, that specific programming and other public interest benefits would result from common ownership.

DECLARATION OF CRAIG COLBOCH

I, Craig Colboch, am the Topeka Market Manager for Morris Communications Corporation, the publisher of the Topeka Capital-Journal and the parent company of MCC Radio, LLC, the licensee of WIBW(AM) and WIBW-FM, Topeka, Kansas. I assisted in the preparation of and have reviewed the accompanying Comments of Morris Communications Corporation.

I hereby declare under penalty of perjury that, to the best of my knowledge, information and belief formed after reasonably inquiry, the information contained therein regarding WIBW(AM), WIBW-FM, and the Topeka Capital-Journal is true and accurate.

A handwritten signature in cursive script, reading "Craig E. Colboch", is written over a horizontal line.

Craig Colboch

December 1, 2001.

DECLARATION OF DAN GORMAN

I, Dan Gorman, am the Amarillo Market Manager for Morris Communications Corporation, the publisher of the Amarillo Globe-News and the parent company of MCC Radio, LLC, the licensee of KGNC(AM) and KGNC-FM, Amarillo, Texas. I assisted in the preparation of and have reviewed the accompanying Comments of Morris Communications Corporation.

I hereby declare under penalty of perjury that, to the best of my knowledge, information and belief formed after reasonably inquiry, the information contained therein regarding KGNC(AM), KGNC-FM, and the Amarillo Globe-News is true and accurate.



Dan Gorman

December 3, 2001.

APPENDIX A

Topeka Market Information

APPENDIX A

**COMPETING INFORMATION PROVIDERS IN THE
TOPEKA, KANSAS AREA**

PROVIDERS OF INFORMATION
WIBW AM/FM
Topeka, Kansas
Page 1

TOPEKA METRO AREA

SHAWNEE COUNTY (Topeka)

Radio: (Home) KJTY-FM KDVV-FM WIBW-FM
 KMAJ-FM KTOP KQTP-FM
 KMAJ (AM) KWIC-FM KTPK-FM
 WIBW

Radio: (Others with listening reported in Topeka
Arbitron, Fall 1996)

KBEQ-FM	KCFX-FM	KCIY-FM
KCMO	KCMO-FM	KLTH-FM
KFKF-FM	KLZR-FM	KMBX
KMXV-FM	KPRS-FM	KQRC-FM
KUDL-FM	KXBZ-FM	KXTR-FM
KYYF-FM	WDAF	

Television: KSNT
 KTKA
 KTWU
 WIBW
 KTMJ
 WBKS

Newspapers: The Topeka Capital Journal - daily
 El Hispano Bilingual
 The Kansas Christian
 The Sherwood Gazette - monthly
 Topeka Metro News - semi-weekly
 The Sentinel - bi-weekly

Cable: Galaxy Cablevision
 TCI of Kansas
 Cable-Tel of Topeka

Direct Mail: Coupon Magazine of Kansas
 S & J Midwest
 Ad-Venture
 Consolidated Mailing Corp.
 Data Documents, Inc.
 DataMail Inc.

PROVIDERS OF INFORMATION

WIBW AM/FM

Topeka, Kansas

Page 2

DTWO Marketing Communications
Ready Mail Inc.
The Home Shopper
Kansas Stockman & Kansas Farmer

Yellow Pages: Southwestern Bell Yellow Pages
Woodward Publications
McLeod Publishing

Directories: The Polk Directory
Topeka Parent & Child Guide Book

Outdoor: Martin Outdoor Advertising
Boyles Portable Sign Rentals
RJ Outdoor

OSAGE COUNTY (OSAGE CITY, LYNDON)

Radio: KANS-FM

Newspapers: Osage County Chronicle - weekly

Cable: Cablevision (Osage City/Lyndon)

Yellow Pages: Sprint Yellow Pages (Osage City)

JACKSON COUNTY (HOLTON, WETMORE)

Newspapers: Holton Recorder - weekly

Cable: CLR Video

Yellow Pages: Sprint (Holton)

WABAUNSEE COUNTY (ESKRIDGE)

Newspapers: Flint Hills Independent - weekly

Cable: Galaxy Cablevision
TCI of Kansas

PROVIDERS OF INFORMATION
WIBW AM/FM
Topeka, Kansas
Page 3

JEFFERSON COUNTY (VALLEY FALLS, OSKALOOSA)

Newspapers: Valley Falls Vindicator - weekly
Oskaloosa Independent - weekly

Cable: CLR Video

Yellow Pages: Sprint (Oskaloosa)

PROVIDERS OF INFORMATION
WIBW AM/FM
Topeka, Kansas
Page 4

TOPEKA DMA

(DMA includes the Topeka Metro Area plus the following):

COFFEY COUNTY (GRIDLEY, BURLINGTON)

Radio: KSNP-FM (Burlington)
Cable: U.S. Cable DBA/Cablevision
Newspapers: Coffey County This Week - weekly
Coffey County Today - weekly
Gridley Gleam - weekly
Yellow Pages: Sprint Yellow Pages (Burlington)

LYON COUNTY (EMPORIA)

Radio: KFFX-FM KVOE-FM
KGZF-FM KNGM-FM
KVOE-AM KANS-FM
Newspapers: Emporia Gazette - daily
The Bulletin
Cable: Classic Cable
Galaxy Cablevision
Yellow Pages: Southwestern Bell (Emporia)
Outdoor: Martin Outdoor Advertising

MORRIS COUNTY (COUNCIL GROVE, WHITE CITY)

Newspapers: Council Grove Republican - daily
Prairie Post, White City - weekly
Cable: Community Antenna Systems, Inc.

PROVIDERS OF INFORMATION
WIBW AM/FM
Topeka, Kansas
Page 5

GEARY COUNTY (JUNCTION CITY)

Radio: KJCK-AM
KJCK-FM

Newspapers: Junction City Daily Union - daily
Ft. Riley Post - weekly

Direct Mail: Direct Results (Junction City)

Yellow Pages: Sprint (Junction City)

Outdoor: Gateway Outdoor Advertising (Junction City)
Heartland Signs (Junction City)
Thomas Sign Advertising (Junction City)

CLAY COUNTY (CLAY CENTER)

Radio: KCLY-FM
KFRM-AM

Newspapers: Clay Center Dispatch - daily

Cable: Cablecom of Clay Center

RILEY COUNTY (MANHATTAN)

Radio: KHCA-FM (Wamego) KXBB-FM
KKSU-AM KOLA-FM
KMAN-AM KSDB-FM
KMKF-FM

Television: KTMJ (Junction City)

Newspapers: The Daily Union - daily
High Plains Journal
Keynotes for Senior Kansans
Manhattan Free Press
The Manhattan Mercury - daily
The Riley Countian - weekly
The Kansas State Collegian - daily
Grass & Grain
Pig Tales

PROVIDERS OF INFORMATION

WIBW AM/FM

Topeka, Kansas

Page 6

Cable: Manhattan Cable TV Services, Inc.
Cencom Cable of Riley
Junction City Television

Direct Mail: SWBYP's Special Delivery (Manhattan)

Yellow Pages: Southwestern Bell (Manhattan)

Outdoor: Thomas Sign Advertising (Manhattan)

POTTAWATOMIE (WAMEGO, WESTMORELAND, ONAGA, ST. MARYS)

Radio: KHCA-FM (Wamego)

Newspapers: Onaga Herald - weekly
St. Marys Star - weekly
Wamego Smoke Signal - weekly
Wamego Times - weekly
Westmoreland Recorder - weekly

Cable: Wamego Cablevision & CLR Video

Yellow Pages: Sprint (St. Marys)

MARSHALL COUNTY (MARYSVILLE, FRANKFORT, WATERVILLE)

Radio: KNDY-AM (Marysville)
KNDY-FM (Marysville)

Newspapers: Marysville Advocate - weekly
Frankfort Area News - weekly
The Telegraph, Waterville - weekly

Cable: TCI Cable

Yellow Pages: Southwestern Bell (Marysville)

NEMAHA COUNTY (SABETHA, SENECA, CENTRALIA, MARYSVILLE)

Radio: KMZA-FM (Seneca)

PROVIDERS OF INFORMATION

WIBW AM/FM

Topeka, Kansas

Page 7

Newspapers: Sabetha Herald - weekly
Seneca Courier-Tribune- weekly
Nemaha County Journal Leader, Centralia

Cable: Beatrice Cable TV (Marysville)
Galaxy Cablevision (Seneca & Sabetha)
Washington Cable TV, Inc.

Yellow Pages: Southwestern Bell (Sabetha, Seneca, and
Marysville)

PROVIDERS OF INFORMATION
WIBW AM/FM
Topeka, Kansas
Page 8

WIBW-FM PRIMARY CONTOUR

(The WIBW-FM Primary Contour includes Topeka Metro Area, DMA, & also the following):

DOUGLAS COUNTY (LAWRENCE)

Radio:	KANU-FM	KLWN-AM
	KJHK-FM	KLZR-FM
Television:	KMCI	
Newspapers:	Lawrence Journal-World - daily	
	Eudora News - weekly	
	High Plains Journal	
	The Ledger	
	The Note	
	Kansas University Daily Kansan - daily	
	Pitch Weekly	
Cable:	Sunflower Cablevision	
	Perry Cablevision	
Direct Mail:	Consolidated Mailing Corp. (Lawrence)	
	Kansas Key Press (Lawrence)	
	Knight Enterprises (Lawrence)	
Yellow Pages:	Southwestern Bell (Lawrence)	
Directories:	Woodward Publications, Inc. (Lawrence)	
Outdoor:	Martin Outdoor Advertising (Lawrence)	

PROVIDERS OF INFORMATION
WIBW AM/FM
Topeka, Kansas
Page 9

FRANKLIN COUNTY (OTTAWA)

Radio: KOFO-AM

Newspapers: Ottawa Herald - daily
Ottawa Times - weekly

Cable: Pittsburg Cable TV
Galaxy Cablevision
Communications Services

ATCHISON COUNTY (ATCHISON)

Radio: KAIR-AM
KAIR-FM

Newspapers: Atchison Daily Globe - daily

Cable: Fanch Cablevision

CLAY COUNTY (CLAY CENTER)

Radio: KCLY-FM

Newspapers: Clay Center Dispatch - daily

Cable: Cablecom of Clay Center
Galaxy Cablevision

DICKINSON COUNTY (ABILENE)

Radio: KABI-AM
KSAH-FM

Newspapers: Abilene Reflector-Chronicle - daily
Chapman Advertiser & Enterprize Journal-weekly

Cable: Cablecom of Abilene
Galaxy Cablecom

Yellow Pages: Southwestern Bell (Abilene)

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CHASE COUNTY

Newspapers: Chase County Leader-News,
Cottonwood Falls - weekly

Cable: Tri Star Cable, Inc.

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WIBW (AM) CONTOUR DAYTIME COVERAGE

WYANDOTTE COUNTY (BONNER SPRINGS, K.C.)

Newspapers: K.C. Record - weekly
Bonner Springs Chieftain - weekly
K.C. Kansan -
Wyandotte West - semi-weekly
Wyandotte Echo - weekly

Cable: Galaxy Cablevision
American Cablevision

Direct Mail: ADVO, Inc.
All Packaging Company
American Lithographics, Inc.
Barkley and Evergreen
Bleich and White Mailing Service
Cha Le Computer Services
City Distributors
Color Works
Computer Mailing, Inc.
Consolidated Mailing Corp.
Contacts Influential America
Corporate Output Services
Courtney Business Assistance
D & O Distributing
Danielle, McKenzie, and Alexander
Data Mail
Direct Data Services
Direct Mail Strategies
Direct Marketing Resources
Dovetail Partner Promotions
Duffy Creative Services
Executive Image Printing
Felco Printing and Mailing
Global Promotional Mailings
Henry Wurst, Inc.
Impact Direct Marketing
Inquest International
KCS Direct Mail
Kansas City Automated Mail, Inc.
Lion Share Marketing, Inc.
List Emporium, Inc.

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List Mart, Inc.
Lund Mark Advertising and Design
Mach 1 Marketing
Mail and More
Mail Print, Inc.
Mail Sort, Inc.
Mailing Clearing House
Marketing Communications, Inc.
Marketing Technologies
Marketshare Publications
Merrigan and Company
Meyer Partners
Midwest Direct Marketing, Inc.
Midwest Mailing, Inc.
Mission Direct Marketing
Money Mailer of Mid America
Money Mailer of North Jackson County
Money Mailer of North Johnson County
Money Mailer of South Johnson County
Neff Printing, Inc.
Neighborhood Advertising
OMNI Media
The Personal Marketing Company
Personalized Envelope Typing Service
Precision Communications
Quality Mail Marketing
Ryan Direct
Ryan/Whitenton Direct Response
J. Schmid & Associates
Southwest Publishing and Mailing
Yellow Pages Sales Office
Staley Marketing Group
Target Direct Marketing
G. Thomas and Associates
Town Planner Calendar
Diane Turner and Associates
Unicorn Stock Photo Library
Valentine-Radford Direct
Val-Pak Coupons
ValuMail
Wilson Direct Source
Wolfe Direct

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Directories: Fred Arbanas, Inc.
B V & K Direct, Inc.
Benchmark Publications
Berstein-Rein Advertising
Berry-Sprint Publishing
Black Pages
Blue Valley Publications
Christenson, Barclay, and Shaw, Inc.
Cole Information Services
Community Connection
Consolidated Directories
Day Advertising
Directory Resource Consultants
GTE Directories
Heart of America Life Pages
Kansas City Golf Magazine
Ketchum Directory Advertising
LaLista Latina Hispanic Business Directory
National Yellow Page Service
Neighborhood Networks
Polk City Directories
Sprint Publishing and Advertising
TMP Worldwide
TV FanFare
Thomas Register of American Manufacturing
VMS Directory Services
Valentine-Radford, Inc.
WCS Publishing
Yellow Page Quick Index

Outdoors: A-AA Portable Sign Rental
Ad Trend Giant Balloons and Searchlights
Balloon Events
Craig Outdoor Advertising
Gannett Outdoor Co. of K.C.
Herron and Company
Impact Imaging, Inc.
Martin Outdoor Advertising
Metromedia Technologies
Missouri Poster and Banner
Odegard Outdoor Advertising
Olson Outdoor, Inc.
Outdoor Sales Office
Premiere Outdoor Advertising

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3M Outdoor Advertising
Wilson Curtiss Outdoor Advertising
The Computer User
National Publishing
Programs for the Arts
Recognition Communications
Outdoor Advertising (LAFAYETTE CO.,
KANSAS CITY, MO.)
Rinne Sign Company (LAFAYETTE CO.,
KANSAS CITY, MO.)
Brooks Publishing Company
Direct to You
The Essential Book
Flyer Distribution Center
Granny's Coupon
Incredicard Limited
The Shoppers Edge
Southwestern Bell Yellow Pages
Town Planner Calendar/Granny's Coupons
Val-Pak of Kansas City

JOHNSON COUNTY (K.C.)

Newspapers: College Blvd. News - weekly
Olathe Daily News - daily
K.C. Jewish Chronicle - weekly
Shawnee Journal Herald - weekly
Sun Newspapers - semi-weekly
Spring Hill New Era - weekly
Gardner News - weekly

Cable: TCI of Overland Park
Jones Intercable
Cablevision (Excelsior Springs)
American Cablevision
Classic Cable

LEAVENWORTH COUNTY (LEAVENWORTH)

Radio: KKLO-AM .

Newspapers: Leavenworth Times - daily
Basehor Sentinel - weekly
Tonganoxie Mirror - weekly

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Cable: Galaxy Cablevision
American Cablevision

Direct Mail: Chronicle Shopper (Leavenworth)
Lansing Publisher, Inc.

Yellow Pages: Southwestern Bell Yellow Pages (Leavenworth)

Directories: Consolidated Mailing Corp. (Leavenworth)

Outdoor: Robinson Outdoor Advertising (Leavenworth)

WOODSON COUNTY (YATES CENTER)

Newspapers: Yates Center News - weekly

Cable: Communications Sources, Inc.

GREENWOOD COUNTY (EUREKA)

Radio: KOTE-FM

Newspapers: Eureka Herald - weekly
Madison News - weekly

MIAMI COUNTY (LOUISBURG, OSAWATOMIE)

Newspapers: Louisburg Herald-weekly
Miami County Republic - semi-weekly
Osawatomie Graphic - weekly

Cable: Classic Cable

LINN COUNTY (PLEASANTON, PLAINVILLE)

Newspapers: Linn County News, Pleasanton - weekly

Cable: Classic Cable (Plainville)
Regional Cable TV

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ALLEN COUNTY (IOLA, HUMBOLDT)

Radio: KALN-AM (Iola)
KIKS-FM (Iola)

Newspapers: Iola Register - daily
Humboldt Union - daily

Cable: Communications Services, Inc.
TCI of Kansas (Humboldt)

BUTLER COUNTY (EL DORADO, ANDOVER, AUGUSTA, ROSE HILL)

Radio: KSRX-AM
KTLK-FM

Newspapers: El Dorado Times - daily
Andover Journal Advocate - weekly
Augusta Daily Gazette - daily
Rose Hill Reporter - weekly

Cable: Multimedia Cablevision

MARION COUNTY (HILLSBORO, PEABODY)

Radio: KJRG-AM
KOEZ-FM

Newspapers: Hillsboro Star - weekly
Marion County Record - weekly
Peabody Gazette Bulletin - weekly

Cable: Galaxy Cablevision (Marion)
Multimedia Cablevision

WASHINGTON COUNTY (LINN, HANOVER, CLIFTON)

Newspapers: Hanover News - weekly
Washington County News - weekly
Linn-Palmer News - weekly
Clifton News Tribune - weekly

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Cable: Regional Cable TV
 Tri Star Cable

Yellow Pages: Southwestern Bell (Washington)

OTTAWA COUNTY (MINNEAPOLIS, DELPHOS)

Radio: KJLS-FM

Newspapers: Delphos Republican - weekly
 Minneapolis Messenger - weekly

Cable: Galaxy Cablevision

BROWN COUNTY (HIAWATHA, HORTON, FAIRVIEW)

Radio: KNZA-FM (Hiawatha)

Newspapers: Hiawatha Daily World - weekly
 Everest World - weekly
 Fairview Enterprise - weekly
 Horton Headlight - weekly

Cable: Fallon Cablevision
 CLR Video

Yellow Pages: Sprint (Hiawatha)

REPUBLIC COUNTY (BELLEVILLE, COURTLAND, SCANDIA)

Radio: KREP-FM (Belleville)

Newspapers: Belleville Telescope - weekly
 Belleville Farmer Stockman - weekly
 Scandia Journal - weekly
 Courtland Journal-Empire - weekly

Cable: Belleville Comm.
 Courtland Cable TV
 Galaxy Cablevision

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CLOUD COUNTY (CONCORDIA)

Radio: KNCK-AM
KCKS-FM
KVCO-FM

Newspapers: Clyde Republican - weekly
Concordia Blade Empire - daily
Glasco Sun - weekly
Miltonvale Record - weekly

Cable: Cablecom of Concordia

Yellow Pages: Southwestern Bell (Concordia)

MITCHELL COUNTY (BELOIT, CAWKER CITY)

Radio: KVSF-AM
KVSF-FM

Newspapers: Beloit Daily Call & Post - daily
Cawker City Ledger - weekly

Cable: Cablecom of Beloit

Yellow Pages: Southwestern Bell (Beloit)

SEDGWICK COUNTY (WICHITA, AND WICHITA AREA)

Radio:	KFDI-AM	KQAM-AM
	KFDI-FM	KICT-FM
	KKRD-FM	KNSS-AM
	KRZZ-FM	KYQQ-FM
	KSGL-AM	KCFN-FM
	KZSN-AM	KDGS-FM
	KZSN-FM	KIBN-FM
	KTLL-FM	KLLS-FM
	KRBB-FM	KFH-AM
	KXLK-FM	KMUW-FM
	KEYN-FM	KANR-FM
Television:	KPTS	KSNW
	KSAS	KWCH
	KSMI	KAKE

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Cable: Multimedia Cablevision

Newspapers: American Gas & Oil Reporter -
 Phoenix Publications -
 Ark Valley News - weekly
 Active Aging -
 Andover Journal Advocate - weekly
 Augusta Daily News - daily
 Bargain Hunters -
 Belle Plaine News - weekly
 Community Voice -
 The Daily Reporter -
 The Wichita Eagle - daily
 East Wichita News -
 Ebony Shopper and News -
 El Dorado Times - daily
 El Perico -
 Haysville Times -
 Mulvane News - semi-weekly
 Ngay Nay -
 OK Times
 Old Town Gazette
 Pennypower Shopping News -
 Plaindealer Newspaper -
 Professional Singles Journal -
 The Prospector -
 Rose Hill Reporter - weekly
 Sedgwick County Competitor -
 Southern Life -
 Town Connection -
 Sunflower Monitor -
 Thompson & Associates -
 Times Sentinel - weekly
 Westside Story -
 White Buffalo Gazette
 Wichita Business Journal - weekly
 Wichita Chronicle -
 Wichita Times -
 Wichita State Sunflower -
 Kansas Newman Vantage -
 Mennonite Weekly Review -
 Thrifty Farmer -
 Wichita Traveler Magazine -
 Wichita Hi-Lighter -
 Wichita Family Ties -

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Short Wing Piper News -
Kansas Bowling News -
The Catholic Advance -
The Triangle Magazine -

Direct Mail: Aces of Kansas
Ad-Mail Marketing
American Advertising, Inc.
Belle Plaine News & Oxford Register
Business Strategies Group, Inc.
Contemporary Communications
Cornerstone Advertising
Dial-a-Waiter
Cornerstone Advertising
Direct Mail Printers
Handy Mailing Service
Home Town Mailer
Mail Marketing Group, Inc.
Mass Media, Inc.
Money Mailers East
Office Aide, Inc.
Penny Power Shopping News, Inc.
Postal Presort, Inc.
Power Saver
Southwestern Bell Yellow Pages
Super Values Coupon Clipper
Targeted Ads
Typed Letters Corporation
Wichita ValuMail Magazine
Your Direct Mail Advertising
Ad Associates Agency
Christian Yellow Pages
Feist Publications
Prairie Publishers
Rose Industrial Services
Penny Power Shoppers News, Inc.
Shoppers Ad-Vantage
Shopper's Guide

Yellow Pages: Southwestern Bell
Feist Publications
Polk Directories

Outdoor: Adverson Outdoor Advertising
Claude Federal Sign & Awning
Dowrcy Outdoor Advertising Company

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Ed Dunn and Sons Signs, Inc.
Mobile Ads
Porta-Ad of Wichita
Poster Company
Prestige Rental Signs
A Plus Graphics
Absolutely Unlimited
Aces of Kansas
Ad Ventures
Advertising Media
Air Capitol Advertising
Arts Advertising Items
Ash-Craft Awards & Engraving
Balloon World, Inc.
Bob Ewing Advertising
Jack Brown & Associates
Business Unlimited
CB Specialties
Cochranis Enterprises
Corporate Advertising Products
Country Accents
Creative Awards & Screen Printing
David Bolduc Ad Specialties
DeWitt Manufacturing
Edison Promotional Advertising Co.
Express Designs of Town West
Frontier International
Bob Gray Company
Great American Incentives
Hamilton Specialty Advertising
Sam Howell Enterprises
K & L Specialty Advertising
KISCO
KNIPP's
Mobile Ads
Premium Promotions
George Roehr & Company
S.F. Barrier, LTD
Single Source
Swag, Inc.
Tangible Advertising
Telesources
US Logo Apparel

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SALINE COUNTY (SALINA)

Radio: KSAL-AM KILS-FM
KYEZ-FM KQNS-FM
KINA-AM KSKG-FM
KCVS-FM KZBZ-FM

Newspapers: Buyers Guide -
Community Line -
Salina Journal - daily

Cable: TCI of Kansas, Inc.

Direct Mail: Marketaide Services, Inc. (Salina)

Yellow Pages: Southwestern Bell Yellow Pages (Salina)

Outdoor: Gateway Outdoor Advertising Company,
Inc. (Salina)

MCPHERSON COUNTY (MCPHERSON, LINDSBORG)

Radio: KBBE-FM
KNGL-AM

Newspapers: Lindsborg News-Record - weekly
Marquette Tribune - weekly
McPherson Sentinel - daily
Canton Pilot - weekly
Ledger, Moundridge - weekly

Cable: Multimedia Cablevision of McPherson

Yellow Pages: Southwestern Bell (McPherson)

RENO COUNTY (HUTCHINSON)

Radio: KGLS-FM KZSN-FM
KHUT-FM KHCC-FM
KSKU-FM KGGG-FM
KWEW-AM

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Newspapers: The Bee, Inc.
The Hutchinson News - daily
Turon Record - weekly
Ninnescah Valley News, Pretty Prairie

Cable: Multimedia Cablevision of Hutchinson

Direct Mail: K & J's Coupons of America (Hutchinson)

Yellow Pages: Southwestern Bell Yellow Pages (Hutchinson)

Directories: Polk & Co.

ELLIS COUNTY (HAYS)

Radio: KAYS-AM KRPD-AM
KHAZ-FM KZLS-AM
KJLS-FM

Television: KBSH-TV

Newspapers: Ellis County Star - weekly
Hays Daily News - daily
Ellis Review - weekly

Cable: Classic Cable

Yellow Pages: Southwestern Bell Yellow Pages (Hays)

Outdoor: Sign & Designs (Hays)

RUSSELL COUNTY (RUSSELL)

Radio: KFNF-FM (Oberlin) KJLS-FM
KRSL-AM KZLS-FM
KCAY-FM

Newspapers: Russell Daily News - semi-weekly
Lucas-Sylvan News - weekly
Russell Record - semi-weekly

Cable: Eagle Communications, Inc.

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PHILLIPS COUNTY (PHILLIPSBURG)

Radio: KKAN-AM
KQMA-FM

Newspapers: Phillips County Review - weekly
Logan Republican - weekly
Heartland Herald-Echo -

Cable: Classic Cable

Yellow Pages: Southwestern Bell (Phillipsburg/Norton)

Outdoor: Sign Biz (Phillipsburg/Norton)

HARVEY COUNTY (NEWTON)

Radio: KJRG-AM
KOEZ-FM
KBCV-FM

Newspapers: Harvey County Independent - weekly
Herald of His Coming
Newton Kansan - daily
Heston Record - weekly

Yellow Pages: Southwestern Bell (Newton)

LABETTE COUNTY (PARSONS)

Radio: KLKC-AM
KLKC-FM

Newspapers: Altamont Journal - weekly
Chetopa Advance - weekly
Edna Sun - weekly
The Parsons News - weekly
Parsons Sun - daily
Oswego Independent Observer - weekly

Yellow Pages: Southwestern Bell (Parsons)

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CRAWFORD COUNTY (PITTSBURG)

Radio: KKOW-AM KRPS-FM
 KKOW-FM KSEK-FM
 KWXD-FM

Television: KOAM

Newspapers: Mulberry Advance - weekly
 Girard Press - weekly
 Pittsburg Morning Sun - daily

BOURBON COUNTY (FT. SCOTT)

Radio: KMDO-AM
 KOMB-FM
 KVCY-FM

Newspapers: Ft. Scott Tribune - daily

CHEROKEE COUNTY (COLUMBUS)

Newspapers: Columbus Daily Advocate - daily
 Galena Sentinel Times - weekly
 Baxter Springs Citizen - semi-weekly

NEOSHO COUNTY (CHANUTE)

Radio: KKOY-AM
 KKOY-FM

Newspapers: Chanute Tribune - daily
 Erie Record - weekly
 Four County Shopper -

Cable: Cablevision of Chanute

WILSON COUNTY (NEODESHA)

Newspapers: Neodesha Derrick - weekly
 Wilson Co. Citizen - semi-weekly

Cable: Cablevision of Neodesha

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MONTGOMERY COUNTY (INDEPENDENCE)

Radio: KIND-AM
 KIND-FM

Newspapers: Caney Chronicle - weekly
 Cherryvale Chronicle - weekly
 Coffeyville Journal - daily
 Independence Daily Reports - daily
 Independence News - weekly
 Good News

Cable: Cablevision of Independence

ELK COUNTY

Newspapers: Elk Co. Citizen
 Advance News, Howard

CHAUTAUQUA COUNTY (SEDAN)

Newspapers: Sedan Times-Star - weekly
 Cedarvale Lookout

COWLEY COUNTY (WINFIELD, ARKANSAS CITY)

Radio: KSOK-AM
 KSOK-FM
 KAZY-FM

Newspapers: Winfield Daily Courier - daily
 Cowley Co. Reporter, Burden - weekly
 Arkansas City Daily Traveler - daily

Yellow Pages: Southwestern Bell (Arkansas City & Winfield)

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SUMNER COUNTY (WELLINGTON, MULVANE, BELLE PLAINE)

Radio: KLEY-AM
KWME-FM

Newspapers: Conway Springs Star - weekly
Mulvane News - semi-weekly
Belle Blaine News - weekly
Wellington Daily News - daily
Oxford Register - weekly
Caldwell Messenger - weekly
South Haven New Era - weekly

Cable: Clearwater Cable Vision, Inc.

LINCOLN COUNTY

Newspapers: Lincoln Co. Sentinel - weekly

ELLSWORTH COUNTY (ELLSWORTH)

Newspapers: Wilson World - weekly
Ellsworth Reporter - weekly

RICE COUNTY (LYONS, STERLING)

Newspapers: Lyons Daily News - daily
Rice Co. Monitor-Journal, Little River-weekly
Sterling Ks. Bulletin - weekly

Cable: Multimedia Cablevision, Inc.

Yellow Pages: Southwestern Bell (Lyons)

KINGMAN COUNTY

Newspapers: Cunningham Courier - weekly
Kingman Journal - weekly
Kingman Leader-Courier - weekly
Norwich News - weekly

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HARPER COUNTY (HARPER, ANTHONY)

Newspapers: Harper Advocate - weekly
Attica Independent - weekly
Anthony Republican

JEWELL COUNTY

Newspapers: Jewell Co. Post, Mankato - weekly

SMITH COUNTY (SMITH CENTER)

Newspapers: Lebanon Times - weekly
Smith Co. Pioneer, Smith Center - weekly

OSBORNE COUNTY

Newspapers: Downs News - weekly
Osborne Co. Farmer - weekly

ROOKS COUNTY

Newspapers: Stockton Sentinel - weekly
Plainville Times - weekly

GRAHAM COUNTY (HILL CITY)

Newspapers: Hill City Times - weekly

TREGO COUNTY (WAKEENEY)

Newspapers: Western Ks. World, Wakeeney - weekly

BARTON COUNTY (GREAT BEND)

Radio: KHOK-FM KVGB-FM
KVGB-AM KZLS-FM

Yellow Pages: Southwestern Bell (Great Bend)

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RUSH COUNTY (LACROSSE)

Newspapers: Rush Co. News, LaCrosse - weekly

NESS COUNTY (NESS CITY)

Newspaper: Ness Co. News - weekly

PAWNEE COUNTY

Radio: KANS-AM
KGTR-FM

Newspapers: Larned Tiller & Toiler - daily

STAFFORD COUNTY

Newspapers: St. John News - weekly
Stafford Courier - weekly

EDWARDS COUNTY

Newspapers: Edwards Co. Sentinel - weekly
Kinsley Graphic

KIOWA COUNTY

Newspapers: Kiowa Co. Signal, Greensburg - weekly
Merchants Directory, Mullinville - weekly

PRATT COUNTY

Radio: KWLS-AM

Newspapers: Pratt Tribune - daily

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BARBER COUNTY

Newspapers: Barber Co. Index, Medicine Lodge - weekly
Gyp Hill Premiere, Medicine Lodge - weekly
Kiowa News - weekly

DONIPHAN COUNTY

Newspapers: Wathena Times
Highland Vivette
Kansas Chief (Troy)

Cable: Falcon Cablevision
CLR Video

IOWA

FREEMONT COUNTY, IOWA (SHENANDOAH, IOWA)

Radio: KMA-AM
KYFR-AM

Newspapers: Valley News Today & Trader

PAGE COUNTY, IOWA (CLARINDA, IOWA)

Radio: KKBZ-FM

Newspapers: Herald-Journal
Valley News Today

POTTAWATTAMIE COUNTY, IOWA (COUNCIL BLUFFS, IOWA)

Radio: KIWR-FM
KLNG-AM
KQKQ-FM

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Television: KBIN

Newspapers: Bulletin
Nonpareil
Omaha World-Herald - daily
Council Bluffs Nonpareil Office Gazette
Glenwood Opinion Tribune
Thrifty Nickel Want Ads

Cablevision: SATV SVS
TCI of Council Bluffs

Direct Mail: Advertising Distributors, Inc./Source
Direct (Council Bluffs)
The Bulletin (Council Bluffs)
Laser One (Council Bluffs)
Midwest Printing (Council Bluffs)

Yellow Pages: U.S. West Direct (Council Bluffs)

MISSOURI

CLAY, JACKSON, PLATTE COUNTIES, MISSOURI

KANSAS CITY, MISSOURI

Radio: KBEQ-FM KCAZ-AM (Mission)

Radio:	KCCV-AM (Overland Park)	KCFX-FM (Harrisonville)
	KCMO-AM	KCMO-FM
	KCNW-AM (Fairway)	KCTE-AM (Independence)
	KCVR-FM	KEXS-AM (Excelsior Springs)
	KFEZ-AM	
	KKFI-FM	KLJC-FM
	KLTH-FM	KMBZ-AM
	KLTH-FM	KMXV-FM
	KNHN-AM	KPRS-FM
	KPRT-AM	KPRS-FM

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KQRC-FM (Leavenworth)

KXTR-FM

WDAF-AM

WHB-AM

KBEQ-FM

KVOL-FM (K.C., KS.)

KYYS-FM

KYYS-FM

KCXL-AM

KCAZ-AM

Television:

KCPT

KCTV

KMBC-TV

KSHB-TV

KSMO-TV

KYFC

WDAF

Newspapers:

Kansas City Star - daily

The Kansas City Kansan - weekly

K.C. Call - weekly

Attorney Research & Investigate Svs.

Basehor Sentinel

Belton & Grandview Shopper

Belton-Raymore-Star-Herald

Bingo Bugle Newspaper

The Blue Springs Examiner

Bonner Springs-Edwardsville Chieftain

The Cass Gazette

Chiefs Report

College Blvd. News

The Daily Record & K.C. Daily News Press

Legal Publications

Discover Mid-America

Dispatch-Tribune

Dos Mundos Bilingual Newspaper

The Downtown Monthly

East Side News

El West Side Shopper

Elbert-Alan Publishing Co., Inc.

The Examiner

Express

Gay & Lesbian News Telegraph

High Plains Journal

The Independence Times Press

Jackson County Advocate

Johnson's County Gazette

The Jonsey Newspaper

The Journal Herald

K.C. Business Journal, Inc.

K.C. Call

K.C. Globe Newspaper

K.C. Hispanic News

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K.C. Insurance Report
K.C. Jewish Chronicle
K.C. Weekend Report
Kansas St. Globe
The Labor Beacon Newspaper
The Labor Times
Leavenworth Chronicle Shopper
Lee's Summit Journal
The Legal Record of Johnson County
Liberty Shopper News
Liberty-Tribune
Lotawana Express News
Metro Voice Newspaper
Missouri State Post
National Catholic Reporter
News Times
The Northeast News
Northland Business Ledger
Northland News
Olathe Daily News
Olathe Sun
Pennypincher Publications
Pitch Weekly
Platte County Gazette
The Pony Express
Quickfinder Publications
Raymore Journal
Raytown Dispatch-Tribune
Raytown Post Newspaper
The Record Newspaper
Shopper News Publications
Smithville Lake Democrat-Herald
Southern Platte Co. Press County
Sports Connection
Sun Chronicle Newspapers
Sun Newspapers
The Edge
Thrifty Nickel Want Ads
Time for News, Inc.
USA Today
Wednesday Magazine
Westport Reporter
Wyandotte Echo
Wyandotte West

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Cable: Alternative Cable Co., Inc.
 American Cablevision
 Budget Cable Co.
 Jones Intercable
 TCI of Overland Park, Inc.

ST. JOSEPH, MISSOURI (July '97)

ANDREW, BUCHANAN, AND DEKALB COUNTIES

Radio: KKJO-FM KSFT-AM
 KFEQ-AM KSJQ-FM
 KGNM-AM

Television: KQTV
 KTAJ

Newspapers: St. Joseph Examiner
 Buchanan County News
 St. Joseph Daily Courier
 St. Joseph Daily Courier - Court Paper
 St. Joseph News Press
 St. Joseph News Press
 St. Joseph Telegraph

Cable: St. Joseph Cablevision
 River Bluffs Rural Cable
 PrimeStar

Direct Mail: Ad-Venture (St. Joseph)
 Consolidated Mailing Corp. (St. Joseph)

Yellow Pages: Southwestern Bell (St. Joseph)

Outdoor: Whiteco Outdoor Advertising (St. Joseph)

CARROLL COUNTY

Radio: KAOL-AM 1430
 KMZO-FM 100.7

Newspapers: Carrollton Daily Democrat

Cable: Cablevision of Excelsior

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DAVIS COUNTY, MISSOURI

Cable: Galaxy Cablevision

PETTIS COUNTY MISSOURI (SEDALIA, MISSOURI)

Radio: KDRO-AM
KSDL-FM
KSIS-AM

Television: KMOS-TV

Newspapers: Plainsman Weekly News

Cable: Falcon Cable Systems

VERNON COUNTY, MISSOURI (NEVADA, MISSOURI)

Radio: KNEM-AM
KNMO-FM

Newspapers: The Nevada News
Nevada Entertainment Weekly
The Nevada Daily Mail-Herald

Cable: TCI Cablevision of Mo.

POTTAWATTAMIE COUNTY, IOWA; DOUGLAS COUNTY AND SARPY COUNTY
NEBRASKA

Radio: Omaha, Nebraska

KBBX-AM	KCRO-AM
KEFM	KESY
KEZO-FM	KFAB
KGDE	KGOR-FM
KIOS-FM	KKAR

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KKCO-FM

KLNG Country Gospel

KOIL-AM

KOSR-AM

KOTD

KSKQ

KRRK

KVNO-FM

KXKT-FM

WOW-FM

WOW-AM

Television:

KETV

KMTV

KOLN/KGIN

KPTM

KXVO

KYNE

WOWT

Newspapers:

Omaha, Nebraska Newspapers

Air Pulse Newspapers

American Citizen Italian Press

Bellevue Leader

Catholic Voice Publishing Co.

Center Point Refurbishing

Council Bluffs Daily Nonpareil

The Daily Record

Douglas County Post-Gazette

Gretna Guide & News

Heartland Retailer

Midland Business Journal

New Horizons

Nuestro Mundo

Omaha Business Journal

The Omaha Shopper

Omaha Star Newspaper

Omaha World-Herald

The Reader

Thrifty Nickel Want Ads

U.S.A. Newspaper, Inc.

U.S. West Direct

OMAHA, NEBRASKA

Magazines:

Nebraskaland Magazine

Nebraska Sports Magazine

Periodicals:

Omaha, Nebraska Periodicals

Alcoholic Beverage Newsletter, Inc.

Human Research Report

Omaha Magazine

Vance Livestock Publications

PROVIDERS OF INFORMATION

WIBW AM/FM

Topeka, Kansas

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Cable: Cox Communications, Inc.
Douglas County Cablevision
Harmon Cable Communications
Horizons Unlimited Satellite TV
Metro-Com
TCI Cable of the Midlands

Direct Mail: A-1 Direct Marketing Services
(OMAHA) A+ Associates, Inc.
ASAP Mail Services, Inc.
Advantage Coupons
Advertising Distributors, Inc./Source Direct
American Business Information, Inc.
American Mail Service, Inc.
Award Print & Mail Services
Blumenthal Cady Comms.
CSS Direct
CAS, Inc.
Culver & Associates, Inc.
Dudycha, Inc.
The Envelope
The Executive Club
The Fisher Group
GPG Printing & Office Supplies
Goodkind & Goodkind Direct, Inc.
Hill Design
Interstate Printing Co.
Justin David Direct
Laser One
Mail America, Inc.
Mail Marketing
Mapleview Press
Midwest Printing Services
N/BE Mail
The Omaha Printing Cos.
Print N Mail
Print Promotions Plus, Inc.
Quick Mailing Services, Inc.
Val-Pak of Nebraska
Ya ffe Printing Co.

Directories: InHouse Marketing, Inc.
McKernan & Associates, Inc.
Millard Rosenberg Nat'l Yellow Pages
Telecom USA Publishing Co.

PROVIDERS OF INFORMATION

WIBW AM/FM

Topeka, Kansas

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U.S. West Direct

Outdoor: Houck Motor Coach Advertising, Inc.
Imperial Outdoor Advertising
Princeton Bus Bench Adv.
3M Nat'l. Adv., Co.
Western Outdoor Advertising Company

LINCOLN, NEBRASKA (LANCASTER COUNTY)

Radio:	KEZG-FM	KFBN-FM
	KFGE-FM	KFOR-AM
	KFRX-FM	KFOR-AM
	KGDE-FM	KHAT-AM
	KIBZ-FM	KHAT-AM
	KLDZ-FM	KMEM-AM
	KLIN-AM	KRNV-FM
	KTGL-FM	KUCV-FM
	KZUM-FM	

Television: KOLN
KVON

Newspapers: Associated Press
Mid-America Ag Net.
News Link
Universal Press Clipping Bureau
Daily Reporter
Lincoln Business Journal
Lincoln Journal Star Newspaper
Lincoln Kids Newspaper
Neighborhood Extra
The News
Omaha World-Herald Circulation Services
Star City Sports Newspaper
Thrifty Nickel Want Ads Newspaper
University of Nebraska-Lincoln-Daily
Nebraskan
Voice News and Printing

Cable: American Telecasting of Lincoln, Inc.
Cablevision
Galaxy Cablevision
VCI Cable - Beatrice

PROVIDERS OF INFORMATION

WIBW AM/FM

Topeka, Kansas

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Direct Mail: Anderson Management Svcs., Inc.
(LINCOLN) Action Direct
All Needs Computer & Mailing Services, Inc.
Anderson Management Services, Inc.
Applied Data Technology
Bankers Direct Marketing
Boomer's Printing Co.
Direct Media Marketing, Inc.
Eagle Quickprint & Copy
EZ Mail
Goldenrod Printing, Inc.
Labadie Communications, Inc.
Lincoln Journal Star
Lincolnland Printing & Specialities, Inc.
Metromail Corporation
Nebraska Printing Center
Presort Limited
Response Marketing

Periodicals: Fastline Publications
Huskers Illustrated
Nebraska Farmer Magazine
Strictly Business
U.S. Industrial News

Outdoor: Ackerly Airport Advertising
Imperial Outdoor Advertising
Nebraska Logos, Inc.
Tomlinson Advertising, Inc.

WASHINGTON COUNTY, NEBRASKA

Newspapers: Blair

DODGE COUNTY, NEBRASKA

Newspapers: Fremont Tribune Daily (Fremont)
Omaha World Herald

Cable: Fremont Cablevision (Fremont)
Shay Satellite Systems (Fremont)

PROVIDERS OF INFORMATION
WIBW AM/FM
Topeka, Kansas
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COLFAX COUNTY, NEBRASKA

Newspapers: Schuyler Sun (Schuyler)

BUTLER COUNTY, NEBRASKA

Newspapers: David City - Banner Press

PLATTE COUNTY, NEBRASKA

Newspapers: Columbus Telegram (Columbus)

Cable: Pawnee-Columbus Cable-TV

POLK COUNTY, NEBRASKA

Newspapers: Headlight Office (Stromsburg)
Polk County News (Osceola)

SEWARD COUNTY, NEBRASKA

Newspapers: Seward County Independent (Seward)
Milford Times (Milford)

YORK COUNTY, NEBRASKA

Newspapers: Trade and Transactions (York)
York News Time (York)

Cable: York Cablevision (York)

RICHARDSON COUNTY, NEBRASKA

Radio: KTNC-AM 1230

Newspapers: Falls City Journal (Falls City)

Cable: Falls City Cable TV

PROVIDERS OF INFORMATION

WIBW AM/FM

Topeka, Kansas

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Tri Star Cable
Time Warner Cable

PAWNEE COUNTY, NEBRASKA

Cable: Time Warner Cable
Tri Star Cable

GAGE COUNTY, NEBRASKA

Radio: KTGL-FM
KWBE-AM 1450

Cable: Beatrice Cable TV
Galaxy CableVision
Diode Cable Company

JEFFERSON COUNTY, NEBRASKA

Radio: KGMT-AM 1310
KUTT-FM 99.5

Newspapers: Fairbury Journal News

Cable: Time Warner Cable
Tri Star Cable

HOLT COUNTY, MISSOURI

Cable: New Path Communications
Tri Star Cable
Oregon Farmers Mutual Telephone Co.

CLINTON COUNTY, MISSOURI

Radio: KMRN-AM 1360
KNOZ-FM 100.1 mHz

Newspapers: Clinton County Leader

Cable: Falcon Cablevision
New Path Communications

PROVIDERS OF INFORMATION
WIBW AM/FM
Topeka, Kansas
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CALDWELL COUNTY, MISSOURI

Cable: Green Hills Comm.
 Falcon/Capitol

PROVIDERS OF INFORMATION
WIBW AM/FM
Topeka, Kansas
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OKLAHOMA

KAY COUNTY, OKLAHOMA (BLACKWELL AND PONCA CITY)

Radio: KIXR KOKB-AM
KLOR-FM KPNC
KLVV-FM WBBZ-AM

Newspapers: Blackwell Journal Tribune
Daily and Sunday Oklahoman
Ponca City News

Cable: Post Newsweek Cable TV

Direct Mail: Customer Direct Coupons (Ponca City)

Yellow Pages: Southwestern Bell (Ponca City)

Directories: Transwestern Publishing Co. (Ponca City)

GARFIELD COUNTY, OKLAHOMA (ENID)

Radio: KXLS-FM KLVV-FM
KOFM KGWA Radio
KNID-FM KCRC
KMKX KALV

Newspapers: The Daily Oklahoman
Daily and Sunday Oklahoman
Enid News and Eagle
Garfield County Daily Legal News
Shopper's Edge

Cable: Cablevision of Medford

Direct Mail: Cromwells, Inc. (Enid)
PDQ Printing & Supplies (Enid)

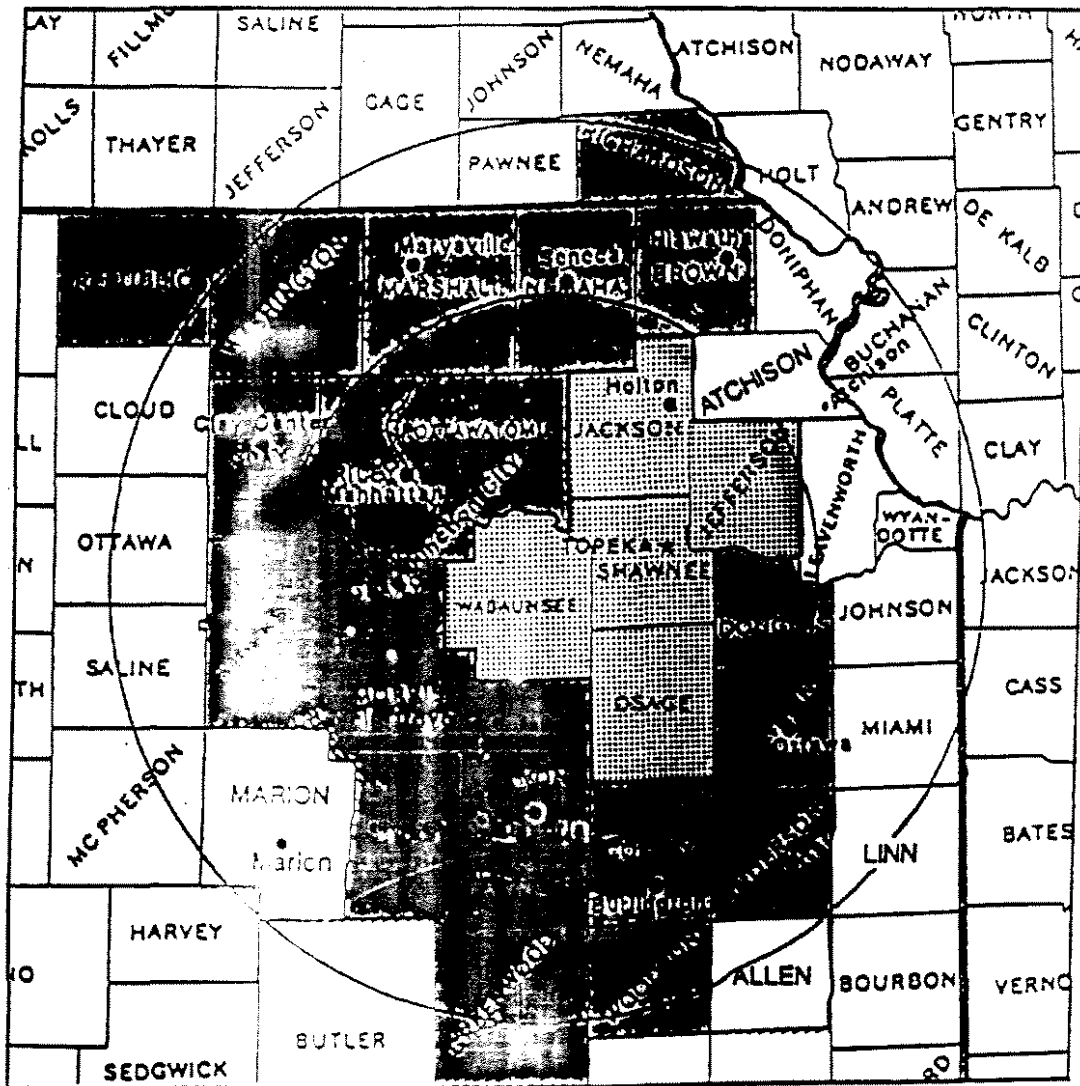
Yellow Pages: Southwestern Bell (Enid)

Outdoor: Golden Plains Outdoor Advertising (Enid)

97 COUNTRY



A New Breed of Country



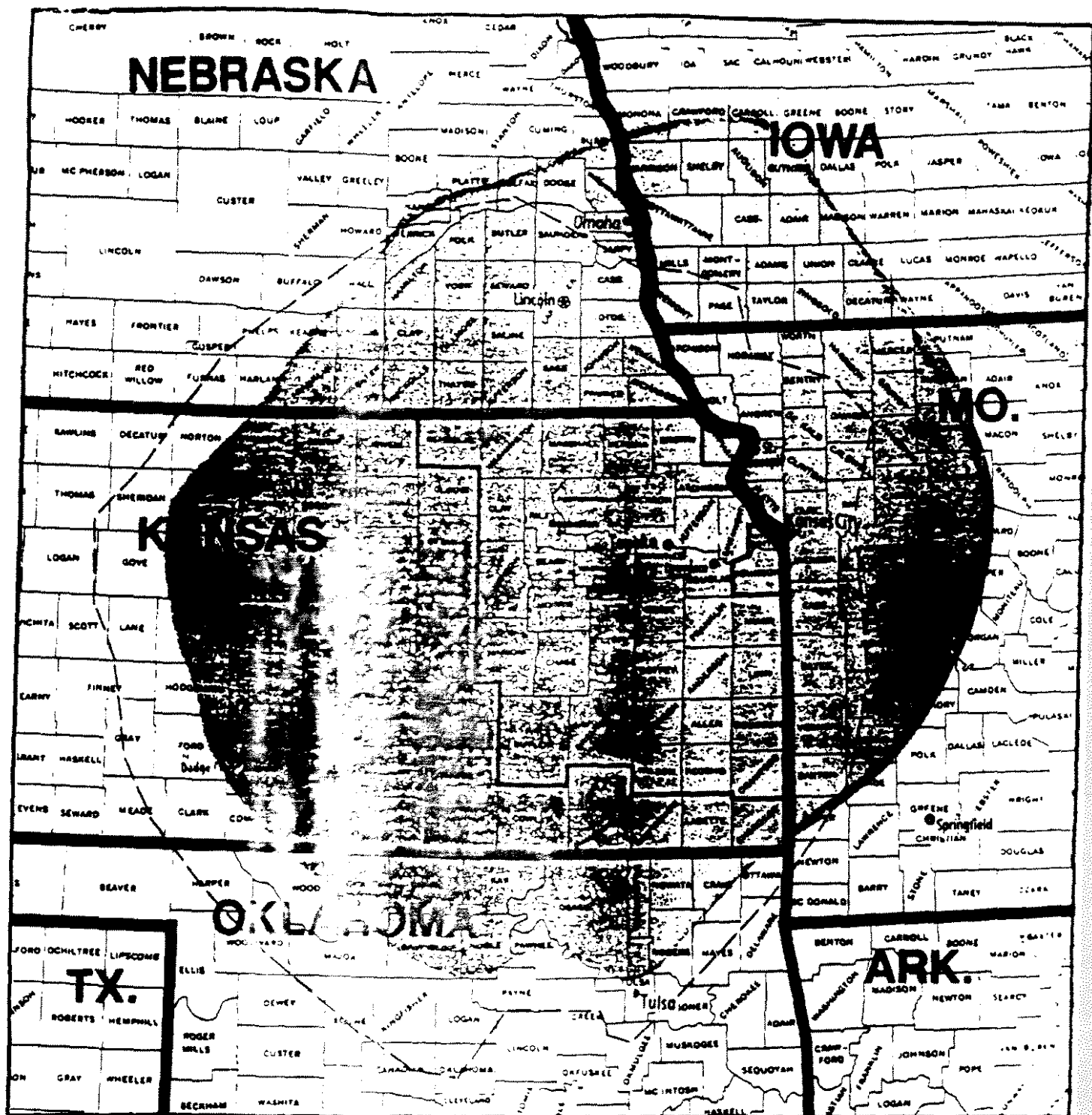
Topeka MSA*



Topeka TSA*

Source: ARBITRON Spring, 1989

Cautions: Ratings are estimates only and subject to the limitations therein.



1/2 Millivolt contour lines
shown as follows:

Day: ☒ Night: -----

Network: CBS

Power: 5,000 watts day and night

Ground conductivity: 30

**580 RADIO
WIBW**

TOPEKA, KANSAS 913/272-3456

APPENDIX B

Amarillo Market Information

Demos: P 12+ Pop: 174712 Intab: 587

Qualitative Selection: none

Geo Area: AMARILLO, TX METRO - Std

Stations: All

Dayparts: 1

Ranked By: P 12+ - AQH Pers (00) (All Selected Stations)

Rank	Station	Daypart	Weeks	P 12+ AQH Rating	P 12+ AQH Share	P 12+ AQH Pers (00)	P 12+ Cume Rating	P 12+ Cume Pers (00)
1	KGNC - FM	M-Su 6:00AM - 12:00M	1 - 12	1.5	9.3	26	18.0	314
2	KPUR - FM	M-Su 6:00AM - 12:00M	1 - 12	1.4	9.0	25	16.4	287
3t	KARX - FM	M-Su 6:00AM - 12:00M	1 - 12	1.3	8.2	23	18.1	317
3t	KZRK - FM	M-Su 6:00AM - 12:00M	1 - 12	1.3	8.2	23	18.1	316
5	KQIZ - FM	M-Su 6:00AM - 12:00M	1 - 12	1.2	7.5	21	15.6	272
6	KGNC - AM	M-Su 6:00AM - 12:00M	1 - 12	1.1	6.8	19	13.9	243
7	KPRF - FM	M-Su 6:00AM - 12:00M	1 - 12	1.0	6.5	18	16.1	281
8	KMML - FM	M-Su 6:00AM - 12:00M	1 - 12	0.9	5.4	15	14.4	251
9	KIXZ - AM	M-Su 6:00AM - 12:00M	1 - 12	0.7	4.7	13	10.6	185
10t	KACV - FM	M-Su 6:00AM - 12:00M	1 - 12	0.6	3.6	10	10.0	174
10t	KAEZ - FM	M-Su 6:00AM - 12:00M	1 - 12	0.6	3.6	10	7.8	136
10t	KATP - FM	M-Su 6:00AM - 12:00M	1 - 12	0.6	3.6	10	7.2	125
13	KMXJ - FM	M-Su 6:00AM - 12:00M	1 - 12	0.5	3.2	9	11.3	197
14	KXRI - FM	M-Su 6:00AM - 12:00M	1 - 12	0.5	2.9	8	5.8	102
15	KQFX - FM	M-Su 6:00AM - 12:00M	1 - 12	0.4	2.5	7	3.4	59
16	KPQZ - FM	M-Su 6:00AM - 12:00M	1 - 12	0.3	2.2	6	2.8	49
17	KXLV - FM	M-Su 6:00AM - 12:00M	1 - 12	0.3	1.8	5	8.4	147
18t	KANZ - FM	M-Su 6:00AM - 12:00M	1 - 12	0.2	1.1	3	3.7	64
18t	KDJW - AM	M-Su 6:00AM - 12:00M	1 - 12	0.2	1.1	3	3.4	59
18t	KJRT - FM	M-Su 6:00AM - 12:00M	1 - 12	0.2	1.1	3	2.5	44
18t	KRGH - FM	M-Su 6:00AM - 12:00M	1 - 12	0.2	1.1	3	3.2	56
22t	KZIP - AM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.7	2	1.2	21
22t	KZRK - AM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.7	2	2.0	35
24t	KBZD - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.4	1	3.3	58
24t	KFMX - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.4	1	0.4	7
24t	KNNK - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.4	1	2.0	35
24t	KONE - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.4	1	0.6	10
24t	KPUR - AM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.4	1	3.0	52
24t	KWTS - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.4	1	1.4	25
30t	KASV - FM	M-Su 6:00AM - 12:00M	1 - 12	0.0	0.0	0	0.0	0
30t	KAVW - FM	M-Su 6:00AM - 12:00M	1 - 12	0.0	0.0	0	1.3	23
30t	KCLV - FM	M-Su 6:00AM - 12:00M	1 - 12	0.0	0.0	0	0.2	4
30t	KCTX - FM	M-Su 6:00AM - 12:00M	1 - 12	0.0	0.0	0	0.0	0

Demos: P 12+ Pop: 343893 Intab: 1237

Qualitative Selection: none

Geo Area: AMARILLO, TX TSA - Std

Stations: All

Dayparts: 1

Ranked By: P 12+ - AQH Pers (00) (All Selected Stations)

Rank	Station	Daypart	Weeks	P 12+ AQH Rating	P 12+ AQH Share	P 12+ AQH Pers (00)	P 12+ Cume Rating	P 12+ Cume Pers (00)
1t	KARX - FM	M-Su 6:00AM - 12:00M	1 - 12	1.3	8.7	45	14.9	511
1t	KGNC - FM	M-Su 6:00AM - 12:00M	1 - 12	1.3	8.7	45	18.3	631
3t	KGNC - AM	M-Su 6:00AM - 12:00M	1 - 12	1.0	6.7	35	12.6	434
3t	KPUR - FM	M-Su 6:00AM - 12:00M	1 - 12	1.0	6.7	35	10.1	347
5	KQIZ - FM	M-Su 6:00AM - 12:00M	1 - 12	0.9	6.0	31	12.8	441
6	KZRK - FM	M-Su 6:00AM - 12:00M	1 - 12	0.8	5.6	29	11.4	392
7	KPRF - FM	M-Su 6:00AM - 12:00M	1 - 12	0.8	5.0	26	12.4	426
8	KMML - FM	M-Su 6:00AM - 12:00M	1 - 12	0.7	4.6	24	12.4	428
9	KATP - FM	M-Su 6:00AM - 12:00M	1 - 12	0.6	3.8	20	7.4	253
10t	KIXZ - AM	M-Su 6:00AM - 12:00M	1 - 12	0.4	2.9	15	6.8	233
10t	KMXJ - FM	M-Su 6:00AM - 12:00M	1 - 12	0.4	2.9	15	10.0	344
12t	KACV - FM	M-Su 6:00AM - 12:00M	1 - 12	0.3	2.3	12	6.5	224
12t	KAEZ - FM	M-Su 6:00AM - 12:00M	1 - 12	0.3	2.3	12	4.9	169
14t	KQFX - FM	M-Su 6:00AM - 12:00M	1 - 12	0.3	1.9	10	2.7	92
14t	KXRI - FM	M-Su 6:00AM - 12:00M	1 - 12	0.3	1.9	10	3.3	113
16t	KCTX - FM	M-Su 6:00AM - 12:00M	1 - 12	0.2	1.3	7	2.4	81
16t	KNNK - FM	M-Su 6:00AM - 12:00M	1 - 12	0.2	1.3	7	3.0	103
16t	KPQZ - FM	M-Su 6:00AM - 12:00M	1 - 12	0.2	1.3	7	1.8	61
19t	KDDD - FM	M-Su 6:00AM - 12:00M	1 - 12	0.2	1.2	6	3.0	103
19t	KXLV - FM	M-Su 6:00AM - 12:00M	1 - 12	0.2	1.2	6	4.6	157
21t	KEFH - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	1.0	5	2.8	96
21t	KLSR - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	1.0	5	1.8	63
21t	KPAN - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	1.0	5	1.6	55
24	KDJW - AM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.8	4	2.0	68
25t	KANZ - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.6	3	1.9	64
25t	KFMX - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.6	3	0.9	31
25t	>KGRO - AM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.6	3	1.1	39
25t	KJIL - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.6	3	0.5	18
25t	KJRT - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.6	3	1.3	45
25t	KQTZ - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.6	3	1.5	50
25t	KRGH - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.6	3	1.8	63
25t	KTNM - AM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.6	3	1.0	33
33t	KCLV - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.4	2	1.0	35

Demos: P 12+ Pop: 343893 Intab: 1237

Qualitative Selection: none

Geo Area: AMARILLO, TX TSA - Std

Stations: All

Dayparts: 1

Ranked By: P 12+ - AQH Pers (00) (All Selected Stations)

Rank	Station	Daypart	Weeks	P 12+ AQH Rating	P 12+ AQH Share	P 12+ AQH Pers (00)	P 12+ Cume Rating	P 12+ Cume Pers (00)
33t	KEYE - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.4	2	1.3	45
33t	KGRW - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.4	2	0.9	32
33t	KKBS - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.4	2	0.6	19
33t	>KLMX - AM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.4	2	1.2	40
33t	>KOMX - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.4	2	1.6	56
33t	KONE - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.4	2	0.9	32
33t	KPUR - AM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.4	2	2.2	75
33t	KQAY - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.4	2	0.8	26
33t	>KRDF - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.4	2	1.0	34
33t	KTNZ - AM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.4	2	1.0	36
33t	KWOX - FM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.4	2	0.8	28
33t	KZIP - AM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.4	2	0.8	26
33t	KZRK - AM	M-Su 6:00AM - 12:00M	1 - 12	0.1	0.4	2	1.0	36
47t	KASV - FM	M-Su 6:00AM - 12:00M	1 - 12	0.0	0.2	1	0.3	9
47t	KAVW - FM	M-Su 6:00AM - 12:00M	1 - 12	0.0	0.2	1	1.1	37
47t	KBZD - FM	M-Su 6:00AM - 12:00M	1 - 12	0.0	0.2	1	1.9	67
47t	KGYN - AM	M-Su 6:00AM - 12:00M	1 - 12	0.0	0.2	1	0.6	22
47t	KLDG - FM	M-Su 6:00AM - 12:00M	1 - 12	0.0	0.2	1	0.8	28
47t	KLLL - FM	M-Su 6:00AM - 12:00M	1 - 12	0.0	0.2	1	0.7	24
47t	KPAN - AM	M-Su 6:00AM - 12:00M	1 - 12	0.0	0.2	1	0.6	20
47t	KPDR - FM	M-Su 6:00AM - 12:00M	1 - 12	0.0	0.2	1	0.4	15
47t	KRTN - FM	M-Su 6:00AM - 12:00M	1 - 12	0.0	0.2	1	1.0	34
47t	KWTS - FM	M-Su 6:00AM - 12:00M	1 - 12	0.0	0.2	1	0.7	25
47t	>KXIT - AM	M-Su 6:00AM - 12:00M	1 - 12	0.0	0.2	1	0.5	16
58	KHYM - FM	M-Su 6:00AM - 12:00M	1 - 12	0.0	0.0	0	0.1	3

See the attached page(s) for station flags/footnotes detail description.

Stations qualify to be reported if they have received five or more minutes of listening in at least 10 diaries in the market, Monday-Sunday 6am-Midnight, during the survey period.

Estimates are derived from the diaries that provided the audience data for the Market Report and are subject to the limitations stated in that Report. Due to these limitations, inherent in Arbitron's methodology, the accuracy of Arbitron audience estimates cannot be determined to any precise mathematical value or definition. This service is not part of Arbitron's regular syndicated service and is not accredited by the Media Rating Council (MRC).

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✓ = Sort column

Radio

<u>LICENSEE</u>	<u>CITY</u>	<u>STATE</u>	<u>MSA</u>	<u>TSA</u>	<u>FM COVERAGE</u>	<u>AM COVERAGE</u>
KRFE	Lubbock	TX		x		x
KWKA	Clovis	NM		x		x
KPET	Lamesa	TX		x		x
KGNC	Amarillo	TX	x		x	x
KFYO	Lubbock	TX		x		x
KDDD	Dumas	TX		x		x
KJON	Anadarko	OK		x		x
KPAN	Hereford	TX		x		x
KFLP	Floydada	TX		x		x
KIXZ	Amarillo	TX	x			x
KXTQ	Lubbock	TX		x		x
KICA	Clovis	NM		x		x
KTUB	Wichita Fall	TX		x		x
KTNZ	Amarillo	TX	x			x
KKRX	Lawton	OK		x		x
KIJN	Farwell	TX		x		x
KKYN	Plainview	TX		x		x
KVDL	Quanah	TX		x		x
KGYN	Guymon	OK		x		x
KLVT	Levelland	TX		x		x
KGRO	Pampa	TX		x		x
KSEY	Seymour	TX		x		x
KCLV	Clovis	NM		x		x
KADS	Elk City	OK		x		x
KXIT	Dalhart	TX		x		x
KXOX	Sweetwater	TX		x		x
KIKZ	Seminole	TX		x		x
KTUE	Tulia	TX		x		x
KSCB	Liberal	KS		x		x
KWFS	Wichita Fall	TX		x		x
KKUB	Brownfield	TX		x		x
KZIP	Amarillo	TX	x			x
KCLI	Clinton	OK		x		x
KVMC	Colorado Ci	TX		x		x
KKAM	Lubbock	TX		x		x
KKEN	Duncan	OK		x		x
KDJW	Amarillo	TX	x			x
DKPOS	Post	TX		x		x
KXCA	Lawton	OK		x		x
KMUL	Muleshoe	TX		x		x
KTNM	Tucumcari	NM		x		x
KEYE	Perryton	TX		x		x
KVOP	Plainview	TX		x		x
KVRP	Stamford	TX		x		x
KULY	Ulysses	KS		x		x
KTJS	Hobart	OK		x		x
KLFB	Lubbock	TX		x		x
KALV	Alva	OK		x		x
KPUR	Amarillo	TX	x		x	x

Radio

<u>LICENSEE</u>	<u>CITY</u>	<u>STATE</u>	<u>MSA</u>	<u>TSA</u>	<u>FM COVERAGE</u>	<u>AM COVERAGE</u>
KLMX	Clayton	NM		x		x
KSEL	Portales	NM		x		x
KWHW	Altus	OK		x		x
KSIW	Woodward	OK		x		x
KSNY	Snyder	TX		x		x
KZUE	El Reno	OK		x		x
KBZO	Lubbock	TX		x		x
KYUU	Liberal	KS		x		x
KDHN	Dimmitt	TX		x		x
KQTY	Borger	TX		x		x
KZZN	Littlefield	TX		x		x
KVWC	Vernon	TX		x		x
KMXO	Merkel	TX		x		x
KCTX	Childress	TX		x		x
KCLR	Ralls	TX		x		x
KZRK	Canyon	TX	x		x	x
KWCO	Chickasha	OK		x		x
KTAT	Frederick	OK		x		x
KDAV	Lubbock	TX		x		x
KWEY	Weatherford	OK		x		x
K201BM	Canadian	TX		x	x	
KTXT	Lubbock	TX		x	x	
K201AY	Borger	TX		x	x	
K201CY	Clovis	NM		x	x	
K201FP	Arapaho	OK		x	x	
K201EP	Hereford	TX		x	x	
990830MJ	Pampa	TX		x	x	
K201EV	Guymon	OK		x	x	
K202AG	Elk City	OK		x	x	
KJRT	Amarillo	TX	x		x	
K202CK	Childress	TX		x	x	
K202HI	Hobbs	NM		x	x	
K202DC	Shattuck	OK		x	x	
K202CX	Conchas	NM		x	x	
K203CB	Lubbock	TX		x	x	
KPBB	Brownfield	TX		x	x	
KPMB	Plainview	TX		x	x	
K203DG	Clovis	NM		x	x	
K204CG	Plainview	TX		x	x	
KASV	Borger	TX		x	x	
K204DB	Portales	NM		x	x	
990602MU	Hereford	TX		x	x	
K204EQ	Woodward	OK		x	x	
K205CW	Follett	TX		x	x	
K205CR	Guymon	OK		x	x	
980901MM	Hereford	TX		x	x	
990521MA	Hereford	TX		x	x	
NEW	Cache	OK		x	x	
KOHM	Lubbock	TX		x	x	
K206BB	Weatherford	OK		x	x	

Radio

<u>LICENSEE</u>	<u>CITY</u>	<u>STATE</u>	<u>MSA</u>	<u>TSA</u>	<u>FM COVERAGE</u>	<u>AM COVERAGE</u>
KXLV	Amarillo	TX	x		x	
K206CN	Portales	NM		x	x	
990723TE	Clinton	OK		x	x	
K207BK	Walsh	CO		x	x	
990126MC	Spearman	TX		x	x	
KENW	Portales	NM		x	x	
K208DH	Bushland	TX		x	x	
K209BK	Springfield	CO		x	x	
K209BT	Plainview	TX		x	x	
K209DI	Elk City	OK		x	x	
K209BT	Plainview	TX		x	x	
KACV-FM	Amarillo	TX	x		x	
K210ML	Altus	OK		x	x	
K210BQ	Woodward	OK		x	x	
K211CF	Perryton	TX		x	x	
KAMY	Lubbock	TX		x	x	
K211CE	Raton	NM		x	x	
K211CW	Hobbs	NM		x	x	
K211CM	Felt	OK		x	x	
K211CB	Guymon	OK		x	x	
K211DZ	Portales	NM		x	x	
K211DW	Tucumcari	NM		x	x	
KOCU	Altus	OK		x	x	
KPHS	Plains	KS		x	x	
K212EN	Elkhart	KS		x	x	
K212BG	Clovis	NM		x	x	
K212DG	Bushland	TX		x	x	
990723MA	Portales	NM		x	x	
K212EN	Elkhart	KS		x	x	
KPDR	Wheeler	TX		x	x	
K213CU	O'Donnell	TX		x	x	
KBAH	Plainview	TX		x	x	
KAYM	Weatherford	OK		x	x	
KBAH	Plainview	TX		x	x	
K214BT	Montoya	NM		x	x	
K214CB	Brownfield	TX		x	x	
K214CC	Hereford	TX		x	x	
K214CH	Keyes	TX		x	x	
KAVW	Amarillo	TX	x		x	
KJOV	Woodward	OK		x	x	
980820MA	Brownfield	TX		x	x	
990310MN	Brownfield	TX		x	x	
K214DH	Portales	NM		x	x	
KKVO	Altus	OK		x	x	
K215AM	Snyder	TX		x	x	
KQRI	Lubbock	TX		x	x	
K215BU	Pampa	TX		x	x	
KAXH	Pampa	TX		x	x	
990318MK	Hobbs	NM		x	x	
990623MA	Hereford	TX		x	x	

Radio

<u>LICENSEE</u>	<u>CITY</u>	<u>STATE</u>	<u>MSA</u>	<u>TSA</u>	<u>FM COVERAGE</u>	<u>AM COVERAGE</u>
K215CV	Guymon	OK		x	x	
KANZ	Garden City	KS		x	x	
K216DO	Morton	TX		x	x	
KWTS	Canyon	TX	x		x	
KAQF	Clovis	NM		x	x	
K216EO	Berlin	OK		x	x	
K217BY	Quay	NM		x	x	
K217BX	Lamesa	TX		x	x	
KBKN	Lamesa	TX		x	x	
K217CM	Clayton	NM		x	x	
KSYE	Frederick	OK		x	x	
K218BO	Borger	TX		x	x	
K218BS	Booker	TX		x	x	
K218BZ	Hobbs	NM		x	x	
980501MA	Bushland	TX		x	x	
KAVO	Borger	TX		x	x	
KWLD	Plainview	TX		x	x	
K218DI	Woodrow	TX		x	x	
K218DB	Vilas	CO		x	x	
K219CC	Dumas	TX		x	x	
K219CD	Dalhart	TX		x	x	
K219DP	Fort Sumner	NM		x	x	
K219DR	Clovis	NM		x	x	
981006MG	Tucumcari	NM		x	x	
990301MC	Hobbs	NM		x	x	
K219DJ	Wellington	TX		x	x	
990421MA	Hobbs	NM		x	x	
KPSU	Goodwell	OK		x	x	
990830MB	Dalhart	TX		x	x	
K219FK	Clinton	OK		x	x	
K220BH	Santa Rosa	NM		x	x	
K220CP	Pama	TX		x	x	
K220EE	Levelland	TX		x	x	
K220FP	Elk City	OK		x	x	
961206ME	Morton	TX		x	x	
K220FT	Portales	NM		x	x	
970501MZ	Levelland	TX		x	x	
990319MD	Santa Rosa	NM		x	x	
KXRI	Amarillo	TX	x		x	
K221CX	Lubbock	TX		x	x	
KMZE	Woodward	TX		x	x	
K221DM	Wagon Mound	NM		x	x	
KIJN	Farwell	TX		x	x	
K222AK	Hugoton	KS		x	x	
K224AU	Laverne	OK		x	x	
KJAK	Slaton	TX		x	x	
KKBS	Guymon	OK		x	x	
KRMN	Shamrock	TX		x	x	
KQAY	Tucumcari	NM		x	x	
K225AH	Ashland	KS		x	x	

Radio

<u>LICENSEE</u>	<u>CITY</u>	<u>STATE</u>	<u>MSA</u>	<u>TSA</u>	<u>FM COVERAGE</u>	<u>AM COVERAGE</u>
KQIZ	Amarillo	TX	x		x	
KRKZ	Altus	OK		x	x	
K228DP	Clayton	NM		x	x	
K228DQ	Portales	NM		x	x	
KWFX	Woodward	OK		x	x	
KXTQ	Lubbock	TX		x	x	
KSEY	Seymour	TX		x	x	
KRTN	Raton	NM		x	x	
KZOR	Hobbs	NM		x	x	
KMXJ	Amarillo	TX		x	x	
KXOO	Elk City	OK		x	x	
KFMX	Lubbock	TX		x	x	
KGRW	Friona	TX		x	x	
K234AG	Ashland	KS		x	x	
NEW	Clayton	NM		x	x	
970722MB	Canadian	TX		x	x	
970724NE	Canadian	TX		x	x	
KOLI	Electra	TX		x	x	
K235AL	Amarillo	TX	x		x	
KFLP	Floydada	TX		x	x	
KSEL	Portales	NM		x	x	
KDDD	Dumas	TX		x	x	
KQMX	Clinton	OK		x	x	
KAIQ	Littlefield	TX		x	x	
KARX	Claude	TX		x	x	
KEYE	Perryton	TX		x	x	
KYBE	Frederick	OK		x	x	
KRSR	Santa Rosa	NM		x	x	
KAZY	Woodward	OK		x	x	
KXIT	Dalhart	TX		x	x	
KCTX	Childress	TX		x	x	
K242AK	Liberal	KS		x	x	
KLLL	Lubbock	TX		x	x	
KECO	Elk City	NM		x	x	
KLMA	Hobbs	NM		x	x	
KMML	Amarillo	TX	x		x	
960409MC	Snyder	TX		x	x	
KVRP	Haskell	TX		x	x	
KWEY	Weatherford	OK		x	x	
KHDY	Plainview	TX		x	x	
K249CD	Lubbock	TX		x	x	
KHIM	Mangum	OK		x	x	
KKCL	Lorenzo	TX		x	x	
KICA	Farwell	TX		x	x	
KRDF	Spearman	TX		x	x	
KICA	Farwell	TX		x	x	
KYMI	Los Ybanez	TX		x	x	
KTIJ	Elk City	OK		x	x	
KPRF	Amarillo	TX		x	x	
KCLV	Clovis	NM		x	x	

Radio

<u>LICENSEE</u>	<u>CITY</u>	<u>STATE</u>	<u>MSA</u>	<u>TSA</u>	<u>FM COVERAGE</u>	<u>AM COVERAGE</u>
KJIL	Copeland	KS		x	x	
KCDL	Cordell	OK		x	x	
KAEF	Clarendon	TX		x	x	
NEW	Vernon	TX		x	x	
KQBR	Lubbock	TX		x	x	
NEW	Springer	NM		x	x	
KBZD	Amarillo	TX	x		x	
970929TE	Hobbs	NM		x	x	
KTQM	Clovis	NM		x	x	
KWFX	Woodward	OK		x	x	
NEW	Lovington	NM		x	x	
KOMX	Pampa	TX		x	x	
KJCM	Snyder	OK		x	x	
KMMX	Tahoka	TX		x	x	
KJCM	Snyder	TX		x	x	
KNNK	Dimmitt	TX		x	x	
NEW	Plainview	TX		x	x	
KIXC	Quanah	TX		x	x	
KPQZ	Amarillo	TX		x	x	
KWOX	Woodward	OK		x	x	
KONE	Lubbock	TX		x	x	
NEW	Tucumcari	NM		x	x	
NEW	Pampa	TX		x	x	
KSLS	Liberal	KS		x	x	
KSNY	Snyder	TX		x	x	
KLEA	Lovington	NM		x	x	
KATP	Amarillo	TX	x		x	
KVWC	Vernon	TX		x	x	
K272DJ	Conchas Da	NM		x	x	
KKYC	Clovis	NM		x	x	
KWDQ	Woodward	OK		x	x	
KZII	Lubbock	TX		x	x	
KLDG	Liberal	KS		x	x	
KIXN	Hobbs	NM		x	x	
KRGN	Amarillo	TX	x		x	
KMUL	Muleshoe	TX		x	x	
NEW	Santa Rosa	NM		x	x	
970915TL	Lubbock	TX		x	x	
NEW	Lamb Cty	TX		x	x	
KJNZ	Hereford	TX		x	x	
KAMZ	Tahoka	TX		x	x	
KKYN	Plainview	TX		x	x	
KHYM	Copeland	KS		x	x	
NEW	Clovis	NM		x	x	
NEW	Fort Sumner	NM		x	x	
KQFX	Borger	TX		x	x	
KLZK	Brownfield	TX		x	x	
NEW	Raton	NM		x	x	
K283AC	Tucumcari	NM		x	x	
NEW	Portales	NM		x	x	

Radio

<u>LICENSEE</u>	<u>CITY</u>	<u>STATE</u>	<u>MSA</u>	<u>TSA</u>	<u>FM COVERAGE</u>	<u>AM COVERAGE</u>
K284AC	Raton	NM		x	x	
KYYI	Burkburnett	TX		x	x	
K285EN	Roy	NM		x	x	
KLGD	Tulia	TX		x	x	
KZQD	Liberal	KS		x	x	
NEW	Borger	TX		x	x	
KLSR	Memphis	TX		x	x	
KLVT	Levelland	TX		x	x	
NEW	Hereford	TX		x	x	
NEW	Graham	TX		x	x	
K288EO	Raton	NM		x	x	
K288EQ	Conchas Da	NM		x	x	
KLVT	Levelland	TX		x	x	
KRBL	Idalou	TX		x	x	
KAEZ	Amarillo	TX		x	x	
KQTZ	Hobart	OK		x	x	
NEW	Clovis	NM		x	x	
K291AD	Des Moines	NM		x	x	
NEW	Santa Rosa	NM		x	x	
KSEM	Seminole	TX		x	x	
KPAN	Hereford	TX		x	x	
KEJS	Lubbock	TX		x	x	
New	Dumas	TX		x	x	
NEW	Tucumcari	NM		x	x	
NEW	Juilliard	TX		x	x	
KFXX	Hugoton	KS		x	x	
KQTY	Borger	TX		x	x	
KVOP	Plainview	TX		x	x	
NEW	San Jon	NM		x	x	
K296EP	Santa Rosa	NM		x	x	
NEW	Raton	NM		x	x	
KOFR	Post	TX		x	x	
NEW	Levelland	TX		x	x	
KSMX	Clovis	NM		x	x	
KSCB	Liberal	KS		x	x	
NEW	Borger	TX		x	x	
971014MA	Idalou	TX		x	x	
971014MD	Idalou	TX		x	x	
971015MF	Idalou	TX		x	x	
971016ME	Idalou	TX		x	x	
971016MG	Idalou	TX		x	x	
971016MI	Idalou	TX		x	x	
971016MJ	Idalou	TX		x	x	
971016MK	Idalou	TX		x	x	
971016MC	Idalou	TX		x	x	
971016MP	Idalou	TX		x	x	
K300AH	Woodward	OK		x	x	
KEYB	Altus	OK		x	x	
NEW	Springer	OK		x	x	

Television

<u>CALL SIGN</u>	<u>LICENSEE</u>	<u>CITY</u>	<u>STATE</u>	<u>MSA</u>	<u>TSA</u>	<u>AM COV.</u>	<u>FM COV.</u>
840305PH	Adventures in Media	Amarillo TX		x		x	x
840305SU	Spectrum Media Mary H Atkins DBA	Amarillo TX		x		x	x
910502BA	Mimi A. Levin	Amarillo TX		x		x	x
930329BE	KCIT Acquisition Co. Inc.	Amarillo TX		x		x	x
AI0305VJ	James E. Still	Amarillo TX		x		x	x
EA0304UF	Marcia L. Crittenden	Amarillo TX		x		x	x
HS0308QS	Jan Girard	Amarillo TX		x		x	x
JD0415RQ	Ned Mortiz	Amarillo TX		x		x	x
JE0415FH	Buddy Norman	Amarillo TX		x		x	x
K20DM	National Minority TV Inc	Amarillo TX		x		x	x
K36DV	Adelante Television Limited Partnership	Amarillo TX		x		x	x
K56DF	Spectrum Media	Amarillo TX		x		x	x
KACV-TV	Amarillo Junior College District	Amarillo TX		x		x	x
KAMR-TV	Quorum of Amarillo License, LLC	Amarillo TX		x		x	x
KAMT-LP	Hispanic Media Group LLC	Amarillo TX		x		x	x
KCIT	Mission B/Cing. Of Amarillo Lic., Inc.	Amarillo TX		x		x	x
KCPN-LP	Mission B/Cing. Of Amarillo Lic., Inc.	Amarillo TX		x		x	x
KEAT-LP	Entravision Holdings, LLC	Amarillo TX		x		x	x
KFDA-TV	Panhandle Telecasting Co.	Amarillo TX		x		x	x
KTXD-LP	Hispanic Media Group LLC	Amarillo TX		x		x	x
KVII-TV	Marsh Media, Inc.	Amarillo TX		x		x	x
NEW	Michael L. Mintz	Amarillo TX		x		x	x
NEW	Carlos Ortiz	Amarillo TX		x		x	x
NEW	Prism Broadcasting Network, Inc.	Amarillo TX		x		x	x
NEW	Martin Weiss	Amarillo TX		x		x	x
NEW	Andrew Fara	Amarillo TX		x		x	x
NEW	Dean M. Mosely	Amarillo TX		x		x	x
NEW	Charles C. Townsend	Amarillo TX		x		x	x
NEW	Prime Time Christian Broadcasting, Inc	Amarillo TX		x		x	x
NEW	Puri Family Limited Partnership	Amarillo TX		x		x	x
NEW	Marcia T. Turner tr/as Turner Enterprises	Amarillo TX		x		x	x
NEW	Tiger Eye Licensing, LLC	Amarillo TX		x		x	x
NEW	John R. Powley	Amarillo TX		x		x	x
NEW	Three Angels Broadcasting Network, Inc	Amarillo TX		x		x	x
NEW	Panhandle Telecasting Co.	Amarillo TX		x		x	x
NEW	Hispanic Media Group LLC	Amarillo TX		x		x	x
NEW	Northfork TV Translator System	Amarillo TX		x		x	x
NEW	Cyril H. Miller	Amarillo TX		x		x	x
NEW	Word of God Fellowship, Inc.	Amarillo TX		x		x	x
NEW	Inspiration Television, Inc.	Amarillo TX		x		x	x
NEW	KM Communications, Inc.	Amarillo TX		x		x	x
NEW	Equity Broadcasting Corporation	Amarillo TX		x		x	x
NEW	Pete E.M. Warren III	Amarillo TX		x		x	x
NEW	Charles C. Townsend	Amarillo TX		x		x	x

*Includes TV Stations, Translator or LPTV
Class A TV, TV Booster, Digital TV, TV Allotment

*Includes Program Test Authority, CP Applied for
Licensed, Licensed and Dark, Unknown status

<u>TYPE</u>	<u>NAME</u>	<u>CITY</u>	<u>STATE</u>	<u>MSA</u>	<u>TSA</u>	<u>FM COVERAGE</u>	<u>AM COVERAGE</u>
Cable	Cox	Amarillo	Tx	x		x	x
	Cox	Canyon	Tx	x		x	x
	Cox	Floydada	Tx		x		x
	Cox	Plainview	Tx		x	x	x
	Cox	Lubbock	Tx		x		x
	Cox	Woolforth	Tx		x		x
	Cox	Andrews	Tx		x		x
	Cox	Clovis	N.Mex.		x		x
	Cox	Dalhart	Tx		x	x	x
	Cox	Guymon	OK		x		x
	Cox	Perryton	Tx		x		x
	Cable One	Pampa	Tx		x	x	x
	Cable One	Borger	Tx		x	x	x
	Cable One	Dumas	Tx		x	x	x
	Cable One	Sunray	Tx		x	x	x
	Cable One	Dalhart	Tx		x	x	x
	Cable One	Perryton	Tx		x	x	x
	Cable One	Fritch	Tx		x	x	x
	Cable One	Panhandle	Tx		x	x	x
	Cable One	Stinnett	Tx		x	x	x
	Cable One	White Deer	Tx		x	x	x
	XIT Rural Co-Op	Hereford	Tx		x	x	x
	Com-Cast	Portales	N.Mex.		x	x	
	Com-Cast	Tucumcari	N.Mex.		x	x	

<u>TYPE</u>	<u>NAME</u>	<u>CITY</u>	<u>STATE</u>	<u>MSA</u>	<u>TSA</u>	<u>FM COV.</u>	<u>AM COV.</u>
Advertising	Great Western Directories	Amarillo	Tx	x		x	x
Directories	Southwestern Bell Yellow Pages	Amarillo	Tx	x		x	x
	Feist Yellow Pages	Amarillo	Tx		x	x	x
Internet	AMA now.com	Amarillo	Tx	x		x	x
	E2M Wesbtelligence Inc.	Amarillo	Tx	x		x	x
	Leading Edge Network	Amarillo	Tx	x		x	x
	World Pages.com	Amarillo	Tx	x		x	x
Magazines	Accent West Magazine	Amarillo	Tx	x		x	x
	Amarillo Style	Amarillo	Tx	x		x	x
	Saddle Baron Magazine	Amarillo	Tx	x		x	x
Outdoor	A to Z Billboard	Amarillo	Tx	x		x	x
	Lamar Outdoor	Amarillo	Tx	x		x	x
	Choice Outdoor	Amarillo	Tx	x		x	x
	Fast Signs	Amarillo	Tx	x		x	x
	Galaxy Outdoor	Amarillo	Tx	x		x	x
	Self Enterprises	Amarillo	Tx	x		x	x
	Image Busboards	Amarillo	Tx	x		x	x
	Skyway Outdoor	Amarillo	Tx	x		x	x
Direct Mail	Amarillo Newcomer Ca	Amarillo	Tx	x		x	x
	G R Advertising	Amarillo	Tx	x		x	x
	National Mail It	Amarillo	Tx	x		x	x
	Welcome Pardner	Amarillo	Tx	x		x	x
	Money Mailer	Amarillo	Tx	x		x	x
	World Pages.com	Amarillo	Tx	x		x	x
	Castlerock Printing	Amarillo	Tx	x		x	x
	Westwind Direct	Amarillo	Tx	x		x	x
	Mail Service	Amarillo	Tx	x		x	x
	Miller National Corporation	Amarillo	Tx	x		x	x
	Panhandle Pre-sort Services	Amarillo	Tx	x		x	x
	Trafton Printing	Amarillo	Tx	x		x	x
Newspapers/ Periodicals	Amarillo Globe-News	Amarillo	Tx	x		x	x
	Shopper's Window	Amarillo	Tx	x		x	x
	Thrifty Nickel	Amarillo	Tx	x		x	x
	Lubbock Avalanche Journal	Lubbock	Tx		x		x
	Amarillo College/The Ranger	Amarillo	Tx	x		x	x
	Brownfield News	Brownfield	Tx		x		x
	Canyon News	Canyon	Tx	x		x	x
	News-Herald	Borger	Tx		x	x	x
	Abernathy Weekly Review	Abernathy	Tx		x		x
	Booker News	Booker	Tx		x		x
	Canadian Record	Canadian	Tx		x	x	x
	Castro County News	Dimmitt	Tx		x	x	x
	Clarendon Enterprise	Clarendon	Tx		x	x	x
	Clovis News Journal	Clovis	NM		x		x
	Friona Star/Bovina Blade	Friona	Tx		x	x	x
	Crosby County News-Chronicle	Crosbyton	Tx		x		x
	Eagle Press	Fitch	Tx		x	x	x
	Idalou Beacon	Idalou	Tx		x		x
	Floyd Co. Hesperian-Beacon	Floydada	Tx		x	x	x

Groom/McLean News	Groom	Tx	x	x	x
Dalhart Texas	Dalhart	Tx	x	x	x
Hereford Brand	Hereford	Tx	x	x	x
Boise City News	Boise City	OK	x		x
Memphis Democrat	Memphis	Tx	x	x	x
Moore County New*Press	Dumas	Tx	x	x	x
County Star-News	Shamrock	Tx	x	x	x
Hart Beat	Hart	Tx	x	x	x
Motley County Tribune	Matador	Tx	x		x
Union County Leader	Clayton	NM	x		x
Morton Tribuine	Morton	Tx	x		x
Olton Enterprise	Olton	Tx	x	x	x
Perryton Herald	Perryton	Tx	x	x	x
Plainview Daily Herald	Plainview	Tx	x	x	x
The Quay County Sun	Tucumcari	NM	x		x
Slaton Slatonite	Slaton	Tx	x		x
Southwest Daily Times	Liberal	Ka	x		x
Miami Chief	Miami	Tx	x	x	x
Quanah Tribune Chief	Quanah	Tx	x		x
Goodwell Texhoma New	Texhoma	OK	x	x	x
Kress Chronicle	Kress	Tx	x	x	x
Hansford Co. Reporter-Statesmar	Spearman	Tx	x	x	x
Portales News-Tribune	Portales	NM	x		x
Wellinton Leader	Wellington	Tx	x	x	x
Guymon Daily Herald	Guymon	OK	x		x
Sayre Record	Sayre	OK	x		x